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United States  
Department of  
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Tongass  
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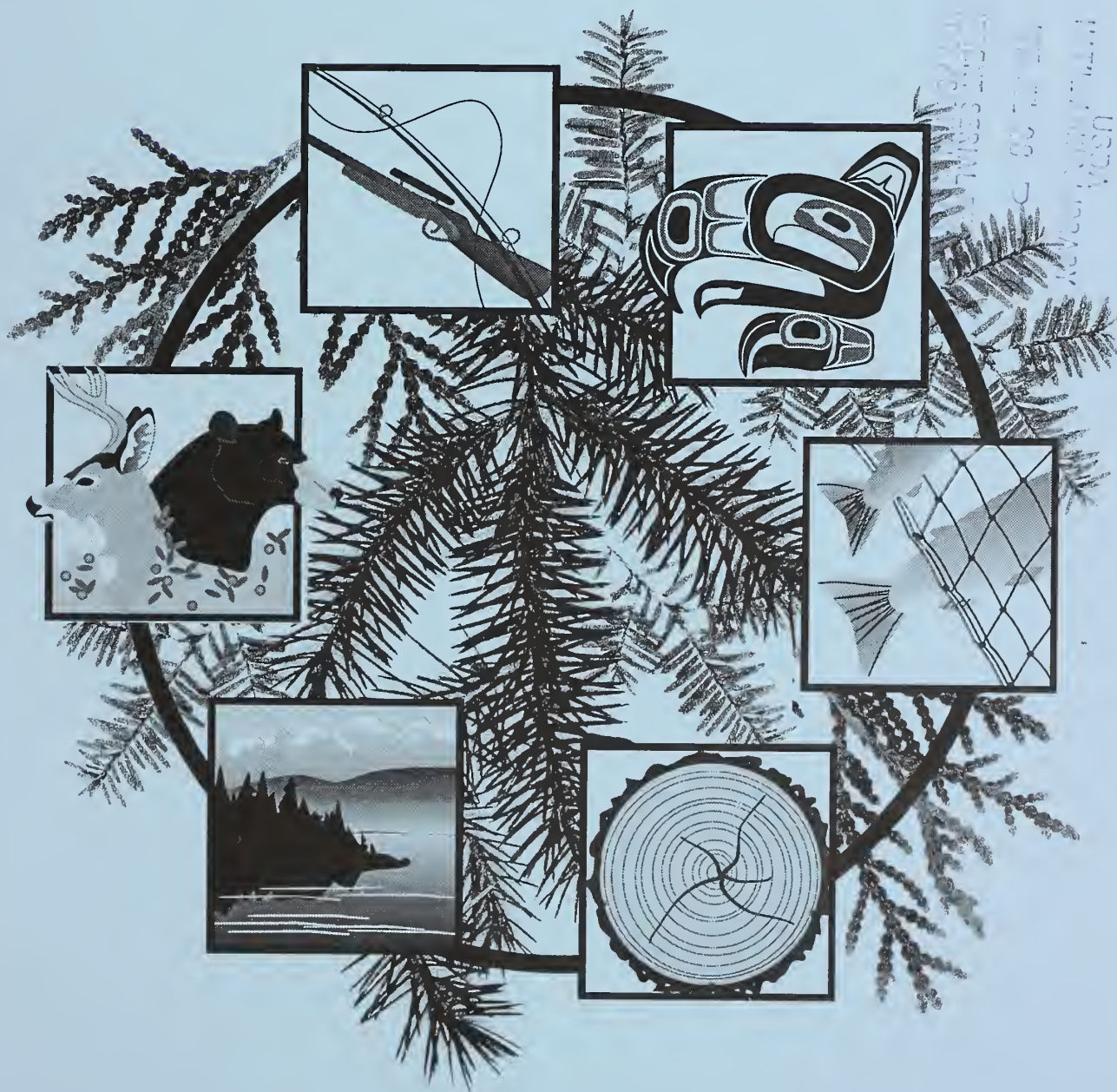
R10-MB-292c

April 1995



# Polk Inlet Timber Sale

## Final Environmental Impact Statement *Volume III*



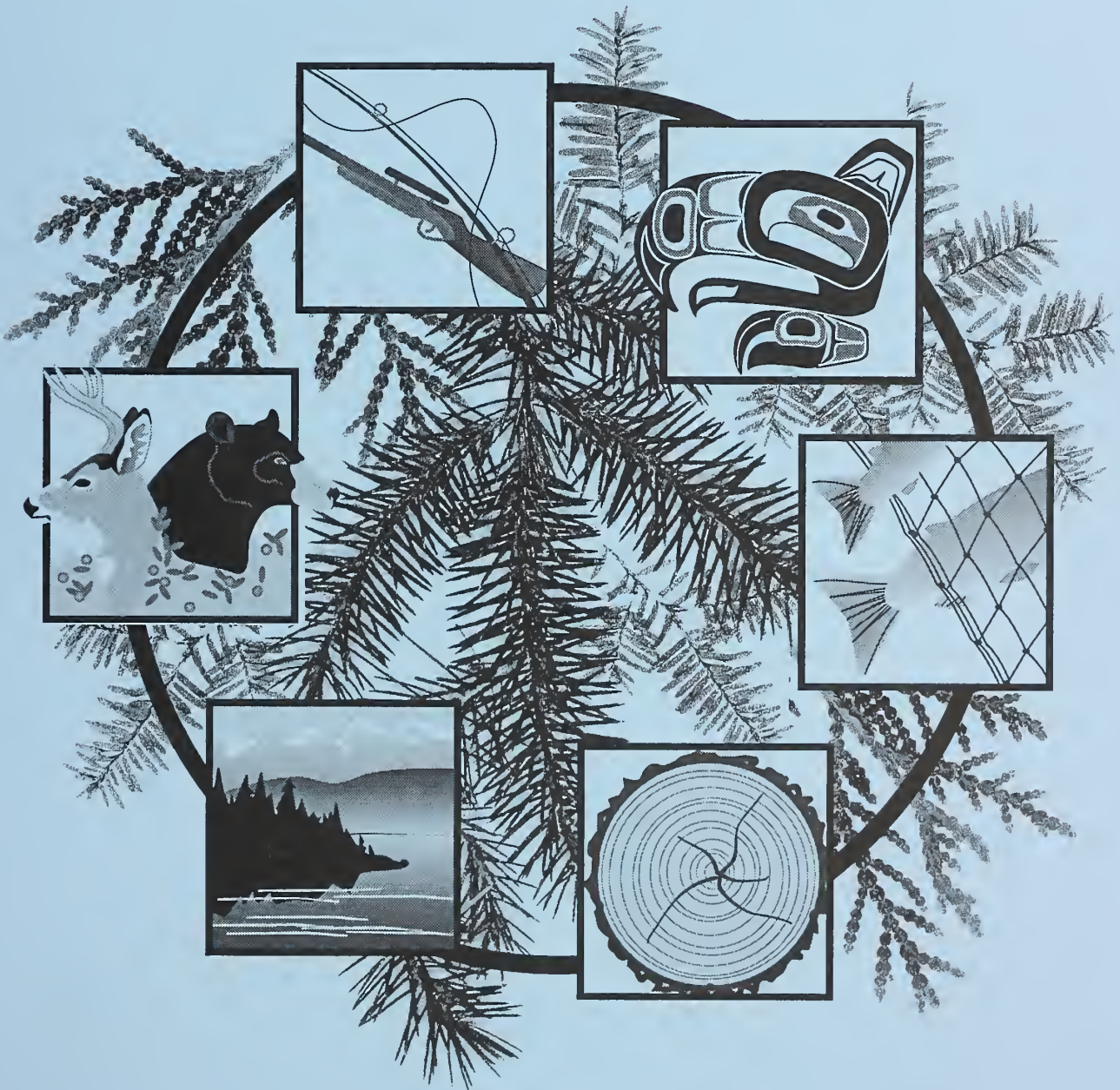
**Foster Wheeler Environmental Corporation**  
*(Formerly Ebasco Environmental)*  
**10900 NE 8th Street**  
**Bellevue, Washington 98004**  
**Contract No. 53-0109-2-00345**  
**Polk Inlet Environmental Impact Statement**





# Appendix H

## Responses to Comments





# Appendix H

## Responses to Comments

Appendix H includes the written comments received on the Draft EIS and provides Forest Service responses to letters with substantive comments.

Availability of the Draft EIS was announced in the *Federal Register* on October 8, 1993 with a deadline for public comment listed as November 24, 1993. Copies were mailed to all on the project mailing list. Notices of the availability of the Draft EIS and announcing the schedule of public open houses and subsistence hearings were placed in the *Ketchikan Daily News* and the *Island News*. Additional notices to radio stations and newspapers in the region were issued.

Subsistence hearings on the Draft EIS were held in Craig, Hollis, Hydaburg, Kasaan, Ketchikan, Klawock, and Saxman during the comment period. Open houses were also held in conjunction with the subsistence hearings to describe the analysis process and answer public questions on the Draft EIS. Public comment on the Draft EIS was also accepted at that time. Comments were recorded and transcribed and are included in Appendix I.

Forty-five individuals, organizations, and agencies submitted written comments on the Draft EIS. Even through the comment period closed on November 24, 1993, letters received after this were accepted and analyzed. Additionally, approximately 360 form letters were received and included in the analysis. (A few form letters that were received late have not been included in the analysis.)

Letters with substantive comments have been coded and the comments within each letter numbered with the code to aid the reader to easily see the Forest Service response to individual comments. Following is a listing of letters with substantive comments, their corresponding codes, and what pages the letters begin. The form letter analysis is included at the end of this first group of letters and includes responses to the questions on the form, responses to additional comments on the forms, a sample form letter, and a list of persons that submitted them.

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United States Department of the Interior



OFFICE OF THE SECRETARY  
Office of Environmental Affairs  
1659 C Street, Room 119  
Anchorage, Alaska 99501-5126

November 24, 1993

ER 93/814

Ms. Abigail Kimball  
Forest Supervisor  
Stikine Area  
Tongass National Forest  
P.O. Box 309  
Petersburg, AK 99833

Dear Ms. Kimball:

The Department of the Interior has reviewed the September 1993, U.S. Forest Service (USFS), Ketchikan Pulp Company Long-Term Timber Sale Contract, Polk Inlet Draft Environmental Impact Statement (DEIS). We offer the following comments and recommendations to be included in the Final Environmental Impact Statement (FEIS).

GENERAL COMMENTS

Mineral Resources

While the DEIS acknowledges the potential positive effects of this timber sale on mineral exploration, it does not consider one possible negative effect; namely, that a mine development located in a logged area that needed timber as mine supports may have to obtain a more costly substitute support material. We believe this potential negative effect should be evaluated for inclusion in the FEIS.

We believe the evaluation of impacts from timber sales on minerals activities would be helped by including latitude, longitude, and township on project maps.

Maps

We recommend the maps provided with the DEIS include (1) increased detail and clear delineation of areas that will be affected by the proposed timber sale--since they are difficult to read, and (2) names of landmarks referred to throughout the document. The map for Alternative 1a does not appear to have all the existing roads and units from the Ketchikan Pulp Corporation 89-94 project included, as stated in the legend.

Forest Fragmentation

The DEIS states that analysis of forest fragmentation in the project area is based on the total number of old-growth forest patches and the percentage of forest interior habitat within specific size classes. It further states "Interior forest patches were defined as old growth within an individual forest patch that is a minimum of 328 feet away from the forest edge." We suggest that the FEIS contain an explanation of why a 328 foot buffer was used and why wider buffers suggested by other studies could not be used. We agree that forest patches below eight acres are all forest edge; in fact, no interior forest conditions are provided in stands less

DOI-1 There will still be substantial timber suitable for mine timbers in the vicinity of all proposed harvest units.

DOI-2 Comment noted.

DOI-3 See response to GRP-17.

DOI-4 Comment noted; see response to ADFG-30.

## Comments of the Department of the Interior

## Responses to the Department of the Interior

DOI-4 (cont'd)	<p>than 100 acres in size (Nelson, 1993). Edge-related predation may extend as far as 1,800 feet into the forest (Wilcove, 1987). We recommend the FEIS show edge-to-area ratios of the 21,000 acre forest patches when analyzing their habitat capability and fragmentation. These ratios are more helpful in determining and comparing patch effectiveness.</p> <p>Marbled Murrelets</p> <p>The OEIS acknowledges that effects of the Polk Inlet timber sale on Marbled Murrelets (<i>Brachyramphus marmoratus</i>) may be greater than discussed in the document because of undiscovered nests in harvest units and the project-wide reductions of old growth. We believe the cumulative impacts of region-wide cutting may also have significant deleterious impacts on the Marbled Murrelet population on Prince of Wales Island; therefore, we suggest that those potential effects be evaluated thoroughly, including mitigation actions proposed to minimize nest disturbance. We further recommend that the FEIS consider development of a management plan for Marbled Murrelets that will ensure maintenance of viable populations of Marbled Murrelets on Prince of Wales Island as well as throughout the Tongass National Forest. We believe the currently proposed 25-30 acre buffer stand for Marbled Murrelet nests is all edge and will not provide suitable Marbled Murrelet interior forest habitat (Nelson, 1993).</p>	As noted in your DOI-16 comment, marbled murrelets are a relatively abundant species in Alaska. It was in direct response to field verification findings for this EIS that interim marbled murrelet guidelines have been developed for the Tongass National Forest. The analysis completed for the EIS concludes there will be direct effects to habitat, but probably minimal affect on populations or species viability. However, it also concludes that continued harvest of old growth at proposed levels could have serious consequences on the species. The cumulative effects of future harvesting is more appropriately addressed at the Forest Plan level. The Forest Plan is in the process of being revised at this time and is addressing those issues.
DOI-5	<p>We recommend increased efforts to locate Marbled Murrelet nests, study Marbled Murrelet nesting ecology, and document their use of forested areas throughout the year. We suggest that two years of intensive inventory surveys be conducted during the breeding season in proposed timber harvest units using procedures described in the Pacific Seabird Group's March 1993, Technical Paper #1 "Methods for Surveying Marbled Murrelets in Forest." We recommend that the results of these surveys and the analysis of what affects fragmentation and edge effect will have on Marbled Murrelet suitable habitat be included in the FEIS and the interagency database. We believe surveys are the only reasonable method to determine the degree to which Marbled Murrelets use the sale area, and to quantify the extent to which the proposed actions will affect this species.</p> <p>We also suggest that the USFS consider using nest search techniques included in the June 30, 1993, draft "Techniques for Finding Tree Nest of the Marbled Murrelet (<i>Brachyramphus marmoratus</i>)" developed by the Pacific Seabird Group Marbled Murrelet Technical Committee. A copy of this document can be obtained from Nancy L. Naalund, U.S. Fish and Wildlife Service (FWS), Migratory Bird Management, 1011 E. Tudor Road, Anchorage, AK 99503 at 907-786-3557.</p> <p>Northern Goshawks</p> <p>We continue to be concerned about the Northern Goshawk (<i>Accipiter gentilis</i>) population in the Tongass National Forest and recommend surveys be continued for the Northern Goshawk in the Polk Inlet area in 1994. The FWS is prepared to meet with USFS representatives to develop a mutually agreed upon goshawk use area management plan if a goshawk nest is found in the Polk Inlet project area.</p> <p>Viable Populations</p> <p>The OEIS does not appear to be managing for viable populations when it acknowledges that all the action alternatives "...would result in substantial reductions in the percentage of forest habitat within the larger patch sizes and the percentage of interior forest habitat..." as stated in Chapter 4 on page 114. The OEIS further states that the "number</p>	As noted in your DOI-16 comment, marbled murrelets are a relatively abundant species in Alaska. It was in direct response to field verification findings for this EIS that interim marbled murrelet guidelines have been developed for the Tongass National Forest. The analysis completed for the EIS concludes there will be direct effects to habitat, but probably minimal affect on populations or species viability. However, it also concludes that continued harvest of old growth at proposed levels could have serious consequences on the species. The cumulative effects of future harvesting is more appropriately addressed at the Forest Plan level. The Forest Plan is in the process of being revised at this time and is addressing those issues.
DOI-6	<p>Comment noted and see response to DOI-5.</p>	Comment noted and see response to DOI-5.
DOI-7	<p>Comment noted.</p>	Comment noted.

## Comments of the Department of the Interior

## Responses to the Department of the Interior

DOI-8	As noted in the response to DOI-5, long-term harvest plans and species viability are being addressed in the revised Forest Plan. The Polk Inlet FEIS includes two old growth retention strategies compatible with the Interagency VPOP recommendations.
DOI-9	The 188,801 figure includes 19,867 acres of National Forest System lands selected by State or Native corporations that have not been conveyed. This is noted on page 9, Chapter 1, of the DEIS.
DOI-10	Comment noted.
DOI-11	Status of Green Monster mine has been classified in the FEIS. See response to Ahr-1.
DOI-12	The name has been included in the FEIS.

DOI-8	of large patches and patch interior would decline further as additional areas are entered for future timber harvest."
DOI-9	The DEIS anticipates the Polk Inlet project will reduce the patch effectiveness for Sitka black-tailed deer ( <i>Odocoileus hemionus sitkensis</i> ) habitat capability by an average of 16.5 percent. The habitat capabilities for other Management Indicator Species will also be significantly reduced, e.g., pino marten ( <i>Haplocheilichthys amabilis</i> ) 10.4 percent average; Red-breasted Sapsucker ( <i>Sphyrapicus varius</i> ) 9.9 percent average; and Hairy Woodpecker ( <i>Picoides villosus</i> ) 13.73 percent average. Furthermore, the DEIS states that only 25,000 acres of total old growth would remain in the project area by the year 2054, a reduction of 72 percent from a pre-logging condition in 1954 of 90,060 acres. We suggest the extensive harvests planned for the future in the Polk Inlet area, as stated in the DEIS, be reconsidered because the habitat capabilities for Management Indicator Species will be significantly reduced (as indicated on page 89 in Chapter 4). Those Management Indicator Species are representative of other species dependent on old-growth habitat.
DOI-10	The Interagency Viable Populations Committee's strategy, "A Proposed Strategy for Maintaining Well-Distributed, Viable Populations of Wildlife Associated with Old-Growth Forests in Southeast Alaska" is discussed to a certain extent in the DEIS, but it has not been applied to the project. The DEIS implies that the concept of Habitat Conservation Areas will be used in the project, but these areas were not actually identified or indicated on a map. Travel corridor standards, which are a vital part of the Interagency Viable Populations Committee's strategy to facilitate movement between Habitat Conservation Areas, are not met. We recommend further emphasis be put toward maintaining the integrity of the existing forest interior patches and wildlife travel corridors. A combination of Alternatives 1a, 2 and 5 may satisfy this concern. Furthermore, we recommend that the USFS apply the Interagency Viable Populations Committee's strategy in the Polk Inlet project.
DOI-9	Chapter 1, page 9. This page shows a total of 168,934 acres of National Forest System land in the Polk Inlet project area, but page 12 gives a different total of 189,801 acres. This discrepancy needs to be corrected in the FEIS.
DOI-10	Chapter 3, page 10. We recommend the reference to the "Kiam mines" in this section be clarified. Older references discuss the Kiam mining camp, but later publications talk about the Khayyam mine and the Kiam mining camp as two separate entities. We suggest the FEIS make the distinction between the Khayyam mine as a past producer, and the Kiam mining camp located 2.8 miles away, which we believe has been abandoned.
DOI-11	Also on page 3-10, is a statement that the Green Monster mine remains in exploration mode and is unlikely to proceed to a production mode. Other sources indicate that exploration, development, and limited production of mineral specimens have occurred for at least 17 years. There is a potential for individuals to trespass on this "inactive" property to collect museum grade specimens when in fact this mine is on private property and is used to generate income for current owners. We recommend this section be revised to reflect current use.
DOI-12	Within the geology section, last sentence, the name of the creek was omitted. This omission needs to be corrected.

### SPECIFIC COMMENTS



## Comments of the Department of the Interior

## Responses to the Department of the Interior

DOI-13	Chapter 3, pages 91 and 93. The DEIS shows a discrepancy in the percent decline of habitat capability for black bear ( <i>Ursus americanus</i> ) from conditions in 1954 and 1994. Page 91 states a 25 percent decline, while Table 3-32 shows a 9 percent decline. This discrepancy needs to be corrected in the FEIS.	DOI-13	Comment noted. Changes have been made in the FEIS.
DOI-14	Chapter 3, page 17. The DEIS states that the USFS will request a variance from the FWS if USFS activities encroach on established eagle nest buffers. The intent of the variance statement (section 11.7, part 3.) in the Interagency Agreement between the USFS and the FWS is for the USFS to request a variance <u>before</u> they encroach on such buffers.	DOI-14	The intent is before an encroachment. Comment noted.
DOI-15	Chapter 3, page 102. We recommend that the FEIS address the need for conducting surveys for needed wildlife baseline data. The DEIS states that specific methodologies used during wildlife surveys are discussed in Dallasalla and Volseen (1993), but this report does not give such information. Specific methods used could only be obtained by talking directly with the contractor who conducted the unit visits, i.e., Ebasco Environmental. The casual "walk-through-once" method to inventory a variety of features of each unit cannot be expected to verify spotted frog ( <i>Rana pretiosa</i> ) habitat or nesting and wintering waterfowl and Harbled Murrelets in the area.	DOI-15	As noted in the DEIS, the walk-through was used in conjunction with other information to determine potential effects on TES species. This and additional information has been included in the Biological Assessment/Biological Evaluation prepared for the Polk Inlet Project (see Appendix J)
DOI-16	Chapter 3, page 104. The FWS gives a more recent estimate of the Alaska Harbled Murrelet population to be 153,030 birds during the breeding period and 166,470 during the non-breeding period. The Alexander Archipelago Harbled Murrelet population during the breeding period is estimated at 96,200 birds, which represents 62.9 percent of the Alaska population (Piatt, 1993). We suggest the FEIS use this information.	DOI-16	The FEIS has been modified to reflect murrelet numbers as given.
DOI-17	Chapter 3, page 105. We suggest the USFS contact the Alaska Department of Fish and Game for an updated number of Northern Goshawk nests in Southeast Alaska.	DOI-17	Revised nest numbers have been incorporated.
DOI-18	We request the FEIS provide documentation to support the statement that the Northern Goshawk may act as an indicator of the degree of forest fragmentation and proportion of high volume timber.	DOI-18	The cite is Crocker-Bedford 1990a as indicated in the DEIS.
DOI-19	Chapter 3, page 106. The DEIS stated that a sighting of a possible spotted frog was made in Value Comparison Unit 612 and that the area could be subject for timber harvest. We suggest the sighting be confirmed by field surveys in the spring of 1994. If spotted frogs are confirmed in the area, we recommend that the FEIS recommend management practices be implemented to protect the hydrology of the watershed, including protection of water quality and quantity. The FWS can assist with frog surveys and in developing an appropriate management plan for the area to protect spotted frog habitat. The FWS is currently investigating the status of this species in Southeast Alaska.	DOI-19	Upon further investigation, the frog(s) observed was a wood frog and not a spotted frog.
DOI-20	Chapter 3, page 110. We believe the literature cited in the DEIS for predation levels extending 328 feet from the forest edge in lodge pole pine is not appropriate and should be omitted. We could not find any reference to edge effect in the Field Guide to Rare Vascular Plants of the National Forest in Alaska, Forest Service, R10-NB-128.	DOI-20	Comment noted; the 328 feet and corresponding 8 acres were identified as minimum thresholds for defining interior forest patches.
DOI-21	Chapter 3, page 111. The DEIS gives a "Workshop" as a source for information given in Table 3-41, but does not explain who gave the workshop and when it was given. We recommend this information be included in the FEIS.	DOI-21	Workshop details are included in the Final EIS.

Comments of the Department of the Interior

Responses to the Department of the Interior

DOI-22      The table has been corrected for the FEIS.

DOI-22      Chapter 4, page 115, Table 4-56. The pine marten habitat effective percentage appears to be in error. We recommend the table be corrected. We appreciate the opportunity to provide these comments. We look forward to working with you on current and future planning efforts to protect the resources of the Tongass National Forest.

Sincerely,



For Paul D. Gates  
Regional Environmental Officer -  
Alaska

Attachment



## Comments of the National Marine Fisheries Service



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668

November 16, 1993

David D. Rittenhouse  
Forest Supervisor  
Ketchikan Area  
Federal Building  
Ketchikan, Alaska 99901

Attn: Polk Inlet EIS

Dear Mr. Rittenhouse:

The Alaska Regional Office, National Marine Fisheries Service (NMFS), has reviewed the Polk Inlet Draft Environmental Impact Statement (EIS). We offer the following comments for your consideration.

**NMFS-1** The EIS presents the existing and proposed log transfer facilities (LTF) for the various alternatives. In the text, Figure 4-25 and Table 4-62 correctly lists those LTFs which are existing, planned, or proposed. However, the maps in Chapter 2 showing the different alternatives depict LTFs that do not exist as existing. LTFs do not exist at the locations shown in McKenzie Inlet and Little Coal Bay.

**NMFS-2** Contrary to the statement in Chapter 4 page 128, the NMFS participated in the cursory on-site investigation of the proposed Sunny Point facility. As joint authors of the report sent to the USDA Forest Service, we did comment. NMFS determined the site not suitable for a LTF. If Alternative 3 is selected, an alternative to the proposed Sunny Point LTF needs to be investigated.

**NMFS-3** Chapter 4, Environmental Consequences, should describe the effects associated with using the existing LTFs. Bark and other woody debris dislodged during log transfer, rafting, and storage activities will not reach the "...open sea before it can accumulate on the bottom." as stated in paragraph one, page 4-128. The areal extent of current bark deposition should be disclosed and compared with that of the expected area of coverage created by additional log transfer activities.

<sup>1</sup>USFWS and NMFS. Report of Field Investigation Cleveland Peninsula: Pt. Francis, Port Stewart; Prince of Wales Island: Twelvemile Arm, Hollis area, McKenzie Inlet, Sunny Point, West Arm Cholomondeley Sound; Dall Island: North Bay, Meares Passage; Sumez Island: Points Remedios/Barrigan, Port Delores for the U.S. Forest Service. Trocadero Bay and San Juan Batista Island for Shaan-Seet Inc. June 15-22, 1986. 18 pp.



## Responses to the National Marine Fisheries Service

NMFS-1

The maps in Chapter 2 are correct because Alternative 1 assumes that all LTF's approved under the 1989-94 EIS will be developed and are included in the baseline. Therefore, they are considered as existing for Alternative 1 and the action alternatives, which are compared directly with Alternative 1. Note that the McKenzie Inlet and Little Coal Bay LTF's are not shown as existing for the Alternative 1A map. This is because, under Alternative 1A, all timber harvest, road construction, and LTF development under the 1989-94 EIS would be stopped at the date of the Polk Inlet ROD, prior to the development of these LTF's.

NMFS-2

The text has been changed to reflect NMFS's joint authorship of the report.

NMFS-3

Refer to responses EPA-11, 12, 13, 14, 15, and 16. Additionally, the quotation is selective. The text states that LTF's are designed to "maximize flushing". The text reference to "open ocean" has been modified.

NMFS-4	<p>The EIS evaluates the potential for effects to humpback whales and Steller sea lions as a result of harvesting timber, log raft transport, constructing roads, and use of existing and proposed log transfer facilities. The EIS concludes that the proposed actions, mitigated by the Tongass Forest Plan Revision Forest-wide Standards and Guidelines that limit vessel and aircraft proximity to marine mammals, are not likely to affect these listed species.</p>	Comment noted.
NMFS-4		
NMFS-5		The indicated corrections have been made in the text.

We concur with the Conclusion that the proposed actions are not likely to affect endangered or threatened species within our purview. This concludes Section 7 consultation requirements for the Polk Inlet timber harvest area covered under this EIS. If new information or circumstances arise that could cause us to alter this determination, consultation pursuant to Section 7 of the Endangered Species Act should be reinitiated.

NMFS-5	<p>The steel cable that entangled a humpback whale in Roosevelt Harbor on Zarembo Island did not come from a LTF but from a former float camp. This correction should be made on page 4-98. All abandoned steel cables need to be removed from the water, regardless of how they were used, to prevent entanglement of marine mammals. On page 4-108 under mitigation, Mitigation Measure W11 for the Steller sea lion should be W12 and Mitigation Measure W12 for the humpback whale should be W13 according to Table 2-3, page 2-38.</p>
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We appreciate the opportunity to comment.

Sincerely,

  
Steven Pennoyer  
Director, Alaska Region



Comments of the EPA-Region 10Responses to the EPA-Region 10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

REPLY TO  
ATTN OF:

WD-126

DEC 27 1993

Dave Rittenhouse, Forest Supervisor  
Ketchikan Administrative Area  
Tongass National Forest  
Federal Building  
Ketchikan, Alaska 99901

Dear Mr. Rittenhouse:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the **Polk Inlet**, Draft Environmental Impact Statement (draft EIS). The proposed action would harvest approximately 125 MMBF from 4,500 acres on the Tongass National Forest. Fifty miles of roads would be constructed, and up to five Log Transfer Facilities (LTFs) would be used.

The stated purpose and need of the timber sale is to "provide timber volume that will contribute to a 3-year current timber supply requirement of the Ketchikan Pulp Company (KPC) contract..., and move toward the desired future condition as identified in the Tongass Land Management Plan (TLMP) (page 1-5)." The North Revilla, Central Prince of Wales, and Lab Bay timber sales are also part of the KPC contract.

The EPA has rated the draft EIS EO-2 (Environmental Objections -- Insufficient Information). Our objections are based on the lack of information about impacts to water quality and fish habitat capability. We are also concerned about marine impacts of LTFs, monitoring, timber harvest sustainability, and forest camps.

This rating and a summary of our comments will be published in the *Federal Register*. A copy of our rating system is enclosed. Thank you for the opportunity to review this draft EIS. Please contact John Bregar at (206) 553-1984 if you have any questions about our comments.

Sincerely,

*Kathy Veit*  
Kathy Veit, Chief  
Program Coordination Branch

Enclosure

cc: Jim Fergusson, ADEC

U.S. Environmental Protection Agency  
Comments on  
Polk Inlet Draft Environmental Impact Statement  
December 17, 1993

The Polk Inlet Draft Environmental Impact Statement (draft EIS) is generally an informative, well prepared and comprehensive document. It addresses most of the pertinent issues and potential environmental impacts of project activities very well. Although the information in the draft EIS is generally excellent, we have provided comments on some issues of concern.

Water Quality/Fish Habitat Capability

EPA-1

It is helpful to get a historical perspective on the condition of fish habitat capability (pages 3-87, 3-37-41), but it is also important to include an indication that these habitat capability models have been ground truthed. On page 3-87, the draft EIS states, "While the models provide an estimate of habitat quality for a given area, habitat quality may not be a reliable indicator of carrying capacity." This is an important fact that should be expanded upon in the final EIS. It provides an avenue for discussion of relevant wildlife surveys and other baseline data gathered in the Project Area.

EPA-2

Habitat capability is not necessarily an accurate indication of the actual numbers of fish that presently exist. The final EIS should include pertinent information about the natural states of the watersheds in the Project Area. Site specific thresholds of concern for water bodies in the Project Area need to be developed based on fish habitat capability models and fish survey results. Water bodies that do not meet Forest Plan Standards and Guidelines or State Water Quality Standards should be identified and presented in a clear format in the final EIS. Fubar Creek, in the Harris watershed, is on the Alaska Department of Environmental Conservation (ADEC) 303(d) list of impaired waters due to adverse impacts related to forest practices. The final EIS should clearly demonstrate that project implementation will comply with state Water Quality Standards. If this is not possible, the project should be modified to avoid water quality impacts.

The relationship between State Water Quality Standards and Forest Plan Standards and Guidelines should be made clear in the final EIS. EPA understands that ADEC will not be able to inventory all state water bodies for the 305(b) report. This does not mean that water bodies not included on the list should be exempt from protection. If there are more impaired water bodies in the Project Area where Forest Plan Standards and Guidelines are not being met, a plan for watershed restoration should be implemented. Timber harvest activities should be temporarily curtailed in these watersheds until full recovery can be demonstrated.

EPA-1

As indicated by the quotation from the EIS this fact is stated in the EIS.

EPA-2

Refer to responses to ADFG-5, ADFG-33, ADFG-34, ADFG-36, and ADFG-37. In regards to Fubar Creek, refer to response to ADEC-1. For pertinent information about the existing condition of watersheds in the Project Area the reviewer is directed to discussions, descriptions and quantitative information in the Soils; Wetlands, Floodplains, and Riparian Areas; Water, Fish, and Fisheries sections of Chapter 3 and Appendix C-3. The relationship between State Water Quality Standards and Forest Plan Standards and Guidelines is discussed in the Chapter 4, Water, Fish, and Fisheries section under Mitigation and Water Quality and Monitoring. State Water Quality Standards are noted, referenced, and compliance discussed in both Chapters 3 and 4 in the Water, Fish, and Fisheries sections. There is no suggestion in the EIS, in the Forest Plan, or in the Forest Plan Standards and Guidelines that any water body on the Tongass National Forest is exempt from protection or meeting State Water Quality Standards.



## Comments of the EPA-Region 10

2

EPA-3

The description of existing water body conditions should include baseline water quality data at the project level in the final EIS. Data from relevant sampling efforts should be included as part of the "affected environment" discussion. The discussion should identify the amount and quality of available resource information, including data gaps and needs. When baseline water quality data are not available, assessments based on extrapolation from comparable watersheds or professional opinion should be carefully explained.

The final EIS should provide a quantitative basis to judge whether physical and chemical parameters, such as temperature, turbidity, and sediment accumulation, will be kept at levels that will protect and fully support designated uses and meet Water Quality Standards under each of the action alternatives. The state's identification of water bodies with impaired uses, as well as the magnitude and sources of such impairment, should also be included.

EPA-4

In addition, the final EIS should describe the relationship between surface water quality and biota found in affected waters. The final EIS should clearly describe the effect of each alternative on designated uses for area surface waters with particular attention to fisheries spawning and rearing habitat. It should also identify which water quality or biological parameters, if any, are limiting factors to local fisheries under each alternative. This information should show the extent to which fish habitat could be impaired by timber harvest and road construction activities, including effects on stream structure, seasonal and spawning habitats, large organic material supplies, and riparian habitats.

EPA-5

The analysis of cumulative effects on fish resources (page 4-45) states, "[decreases in habitat capability] are from older harvest, not from the results of any of the considered alternatives." The indication that habitat capability is decreasing but harvest activity is increasing is alarming. The decision of whether to harvest or not should clearly take into account the impacts of past activities on water resources. EPA recognizes that the Forest Service does not have control over previous timber harvest impacts, but this does not mean the problem should be exacerbated by additional impacts from this project.

### Sediment

EPA-6

The effects analysis for sediment input due to project activities lacks depth and clarity. On page 4-31, an index for sediment delivery, created by Baker and Stewart (1993), is presented. The results of the Project Area survey should be included in the final EIS. This is the only indication the public has of the potential sediment increases to site specific locations. These are the types of monitoring survey results that help determine a baseline for future comparison.

## Responses to the EPA-Region 10

Water quality data is noted in the EIS and included in the Fisheries and Watershed Resource Report for the Polk Inlet Project Area (Baker and Stewart 1993) which is contained in the planning record. A copy of this report was also provided to Bruce Cleland of the EPA Seattle office on December 30, 1993. Additionally, the original water quality laboratory sheets are in the planning record. As indicated in the EIS these data indicate that water bodies in the Project Area meet State Water Quality Standards.

The reviewer is directed to both the Chapter 3 and 4 discussions, descriptions and quantitative information in the Soils; Wetlands, Floodplains, and Riparian Areas; Water, Fish, and Fisheries sections and Appendix C-3. These sections of the EIS specifically discuss these factors.

EPA-5

Refer to responses to ADFG-5, ADFG-33, ADFG-34, ADFG-36, and ADFG-37. Additionally, as stated in the quotation, the effects are not from implementation of the alternatives. The EIS discusses the use and effectiveness of BMP's in preventing impact to fisheries resources. Figure 4-4 and associated discussion evaluates potential risk to fish habitat for all alternatives. Additional discussion is provided in the Soils; Wetlands, Floodplains, and Riparian Areas; and Water, Fish, and Fisheries sections.

EPA-6

As stated in the EIS the sediment delivery index is based on the method of Hogan and Wilford (1989); it was not created by Baker and Stewart (1993). The results for the Project Area are shown in Table 4-12. As stated in the EIS, the analysis indicates a potential for sediment delivery for the action alternatives. The analysis is not a monitoring survey. A copy of the Baker and Stewart (1993) report was provided to Bruce Cleland of the EPA Seattle office on December 30, 1993.



Section 319 of the Clean Water Act

EPA-7

Section 319 addresses surface water quality assessments and a non point source pollution management program. These assessments identify surface water that cannot reasonably be expected to attain or maintain applicable Water Quality Standards or goals without control of non point source pollution.

The federal consistency provisions of Section 319 represent an opportunity for state and federal agencies to more closely coordinate their activities and cooperate in achieving water quality goals. If a state determines that a federal project is not consistent with the provisions of the non point source program, the federal agency must make efforts to accommodate the state's concerns. Executive Order 12372 provides guidelines for using the state intergovernmental review process for conducting Section 319 federal consistency reviews.

The NEPA process must also integrate the provisions of Section 319. Existing water quality conditions in NEPA documents should reflect the state's water quality assessment. Direct or indirect non point source water quality effects should be reduced through design and through mitigation measures to ensure consistency with the state's non point source program.

Monitoring

EPA-8

In our March 4, 1993 comment letter for the North Revilla Timber Sale we requested that the final EIS include additional information on monitoring. Subsequently, we found that the final EIS actually provided less information and outlined fewer parameters to be monitored than the draft EIS. EPA places a high level of interest on forest monitoring practices.

The Polk Inlet draft EIS does not provide a basis to judge whether sediment accumulation will be kept at levels that protect beneficial uses and meet WQS. The harvest unit cards identify steep slope areas where harvest will occur even with a high risk of erosion (units 621-308, 622-208, and 622-266 are a few examples). Given this information, it will be particularly important that BMP success be verified through monitoring. The record of decision should include a commitment to monitoring sediment to ensure that effectiveness is measured. The Ketchikan Area Monitoring Plan should be included in the final EIS.

Timber Harvest Sustainability and Alternative Development

EPA-9

The Polk Inlet Timber Sale will leave approximately 86 percent of the Project Area in a modified state (page 1-10). EPA is very concerned with this level of timber

Refer to responses to ADFG-5, ADFG-33, ADFG-34, ADFG-36, and ADFG-37. Additionally, the surface water quality assessments, nonpoint source pollution program, and on-going coordination between the Forest Service and ADEC are discussed in the Water, Fish, and Fisheries section of Chapter 4.

EPA-7

Since 1993, in conjunction with the Alaska Department of Environmental Conservation (DEC), BMP's are being evaluated for effectiveness on an annual basis. This monitoring stems from the Memorandum of Agreement (MOA) for BMP implementation between the DEC and the Forest Service (March/April 1992), which calls for an annual plan of work to prioritize water quality monitoring. Depending on the results of monitoring, BMP's may be adjusted over time (FSH 2909.22, Part 1, p. 8). The Ketchikan Area Draft Monitoring Strategy (March 1994) is incorporated by reference in the FEIS.

EPA-8

The description referred to on page 1-10 of the DEIS represents the desired future condition of the Project Area given full implementation of the preferred alternative (Alt. P) of the TLMF Draft Revision Supplement (1991a) based on Land Use Designations. It does not represent the Project Area after implementation of the Polk Inlet Project. After implementation of one of the Polk Inlet Project action alternatives about 71% of the Project Area commercial forest land would remain unharvested. Sustained yield calculations are done at the Forest Plan-level and are being reviewed with the current revision of the Forest Plan. Refer to the *Timber and Vegetation* section of Chapter 4 in the Final EIS.

EPA-9

## Comments of the EPA-Region 10

4

EPA-9 harvest. What is the time frame for sustained yield calculations? EPA recommends that additional alternatives be developed that meet sustained yield goals in addition to KPC contract responsibilities.

### EPA-10 Harvest Unit Design Cards

These cards provide the kind of site specific detail that EPA strongly supports. It would be very helpful, however, to include geographical information about which stream segments we are seeing in the diagrams. It is difficult and time consuming to determine the effects of harvest activities on stream segments of concern without this information.

### Log Transfer Facilities (LTFs) and Associated Marine Impacts

Alternative 1 involves the continued use of an existing LTF at Polk Inlet; Alternatives 2,3,4, and 5 involve continued use of two existing LTF's (Twelvemile Arm and Polk Inlet) and establishment of two new LTFs at two permitted sites in McKenzie Inlet. Alternatives 3 and 4 also include development of new LTFs at Sunny Cove and Little Coal Bay, respectively.

The Polk Inlet draft EIS contains far less information regarding marine impacts than a typical U.S. Forest Service Timber Sale EIS. The following elements would normally be included in an EIS for a timber sale contract.

EPA-11 1. The final EIS should clearly show proposed LTFs and timber volumes associated with each alternative

In order to clearly identify the marine impacts associated with each alternative, the final EIS could include a table similar to the one we developed below. Our example is based on the draft EIS summary of alternatives (pages 10-13), and may not be accurate nor complete. This format would facilitate comparison of volumes per alternative.

## Responses to the EPA-Region 10

EPA-10 A larger scale Project Area map has been added to the FEIS which shows, among other things, the harvest units in the Project unit pool and the streams including the names of major streams. In addition, the unit cards have been modified to show the names of major streams of concern.

EPA-11 The requested information on LTF's is incorporated in the FEIS.

Comments of the EPA-Region 10

Responses to the EPA-Region 10

EPA-11  
(cont.)

LTF - name & type	Alt. 1 (mmbf)	Alt. 2 (mmbf)	Alt. 3 (mmbf)	Alt. 4 (mmbf)	Alt. 5 (mmbf)
Polk Inlet (Double A-frame)	?	115	120	110	115
McKenzie Inlet 1 (?)	?	0	0		
McKenzie Inlet 2 (?)	?	0	0		
Twelvemile Arm (Single A-frame)	?	0	0		
Sunny Cove (?)	?	0	5		
Chomly (?)	?	0	0	5	
Little Coal Bay (?)	?	10	0	10	10

EPA-12

The effects of log transfer facilities on the marine environment, including the accumulation of bark, is discussed in Chapter 4 of the EIS in the Log Transfer Facility section. Facility siting information, including dive report recommendations, are discussed in the same section.

EPA-12

2. The final EIS should include a general description of the effects of log transfer activities on marine habitats

The most significant problem associated with water storage of logs appears to be bark loss.<sup>1</sup> Schultz and Berg measured bark accumulations at 32 inactive log transfer facilities in southeast Alaska. They found deposits up to 182 acres, with an average of 1.96 acres per site (excluding the 182-acre site).<sup>2</sup> The adverse impacts of wood waste deposits on the aquatic ecosystem are well documented, and include smothering of organisms and chemical changes caused by leaching and decomposition of the waste.<sup>3,4,5</sup> Deposits over 3 cm deep result in measurable changes in the benthic community.<sup>6</sup> Bark and woody debris decay slowly and may remain for decades.<sup>7</sup>

The Tongass Land Management Plan Revision Supplement to the Draft EIS (August 1991) outlines the U.S. Forest Service's goal to operate LTF's in areas which will "best avoid or minimize potential impacts on water quality, aquatic habitat and other resources. ... The USDA Forest Service has adopted the 'Log Transfer Facility Siting, Construction, Operation, and Monitoring/ Reporting Guidelines' developed by the Alaska Timber Force." The Alaska Timber Force guidelines were developed by private, public, and resource agency personnel to delineate methods to minimize adverse environmental impacts of log transfer facilities. The guidelines stress that facility siting is the most effective means of reducing the adverse effects associated log transfer facilities.



## Comments of the EPA-Region 10

6

EPA-12  
(cont.)

The North Revilla draft EIS includes a more complete analysis of impacts associated with log transfer activities (see Attachment #1). We suggest that the Polk Inlet final EIS also incorporate a section to address these impacts.

EPA-13

3. The final EIS should include a comparison of alternative LTF methods and proposed sites. The final EIS should include habitat descriptions and detailed plan drawings for each proposed site.

The North Revilla draft EIS provides an example of a thorough analysis of the proposed alternative LTF's, including an evaluation of LTF methods and potential impacts. Plan drawings were developed for each alternative and included in the appendix. The appendix also included a copy of all dive reports available for the proposed LTF's (see Attachment #2).

EPA-14

4. The final EIS should incorporate the results of the 1986 dive survey conducted by National Marine Fisheries Service and U.S. Fish and Wildlife Service.

The 1986 dive survey evaluated several sites directly involved in the proposed timber sale. For instance, biologists investigated potential LTF sites at Twelvemile Arm, McKenzie Inlet, and Cholmondeley Sound (including Sunny Point). The dive report itself should be included in the appendix of the final EIS, and the findings should be summarized in the evaluation of alternatives. For instance, the biologists found the site at Sunny Point to be highly productive and diverse, and therefore inappropriate for development of an LTF (see Attachment #3).

EPA-15

5. The final EIS should include an analysis of each site with respect to the Alaska Timber Task Force Guidelines.

Attachment #4 shows a summary of the Alaska Timber Task Force Guidelines. This summary should be included in the appendix of the final EIS along with an evaluation of how each proposed LTF meets the guidelines. For example, the final EIS should clearly state that the LTF proposed at Sunny Point does not meet Guideline S6 for Site Productivity.

EPA-16

6. The final EIS should incorporate the most recent bark dive surveys for existing LTF's which will be affected by the proposed alternatives.

The EIS should clearly document the extent of bark deposition at each existing LTF. The EIS should thus address whether existing LTF's meet the Alaska Timber Task Force guidelines, particularly with respect to bark deposition. The final EIS should address remediation measures if it appears that any of the proposed alternatives will cause a violation in water quality standards (i.e., if the bark deposit may exceed one acre, 100% cover and 10 cm deep).

## Responses to the EPA-Region 10

The preferred alternative will not require the construction of any new log transfer facilities. Existing and permitted facilities, or facilities approved under the 1989-94 FEIS, will be utilized for the Polk Inlet Project. The LTF's at Sunny Point and Cannery Creek will not be needed under the preferred alternative. The dive report is contained in the planning record.

EPA-13

Refer to responses to EPA-12 and EPA-13. Additionally, the dive report the reviewer refers to is specifically discussed in the Chapter 4 Log Transfer Facility section. Additionally, the fact that the participants in that dive report did not recommend the Sunny Point site is also specifically stated in the EIS in the same section just referred to.

EPA-14

Refer to responses to EPA-12, EPA-13, and EPA-14.

EPA-15

The existing LTF's operate under regulations that apply to existing permits. The authorized LTF's will be operated under the regulations applied to their permits when granted. The Polk Inlet LTF operates under a permit that does not require monitoring. The Twelvemile LTF operates under a permit that does require monitoring. The Twelvemile LTF has been operating since 1992. The June 1993 dive survey indicates an average bark depth of 6.9 centimeters. An area of approximately 0.08 acre has 100 percent cover greater than 10 centimeters deep. The report states that the new debris accumulation does not appear to have significantly impacted the marine life compared to the previous year's survey.

EPA-16

EPA-17      The EIS has been edited to better address the common problems and mitigation measures associated with forest camps.

EPA-17      Forest Camps

EPA is concerned about the impact of long term forest camps on the surrounding water quality and wildlife. Commonly, sewage treatment, solid waste, wildlife attraction, and cleanup practices have been issues in the past. It is the Forest Service's responsibility to institute pollution prevention measures for camps, and the final EIS should devote a small section discussing common problems and appropriate mitigation measures that can be implemented in these forest camps.

END NOTES

1. Schaumberg, F.D. 1973. The influence of log handling on water quality. Report EPA-R2-73-085 (Washington: Environmental Protection Agency, Office of Research and Monitoring). 105 pp.
2. Schultz, R.D. and R.J. Berg. 1976. Some effects of log dumping on estuaries. (Juneau: National Marine Fisheries Service, Environmental Assessment Division). 64 pp.
3. Buchanan, D.V., P.S. Tate, and J.R. Morning. 1976. Acute toxicities of spruce and hemlock bark extracts to some estuarine organisms in southeastern Alaska. J. Fish. Res. Board Can. 33:1188-1192.
4. Chang, B.D. and C.D. Levings. 1976. Laboratory experiments on the effects of ocean dumping on benthic invertebrates. 1. Choice tests with solid wastes. Fish. Mar. Serv. Res. Dev. Tech. Rep. 637. 65 pp.
5. Schultz and Berg.
6. Conlan, K.E. and D.V. Ellis. 1979. Effects of wood waste on sand-bed benthos. Mar. Poll. Bull. 10:262-267.
7. Ellis, R.J. 1973. Preliminary biological survey of log-ratting and dumping areas in southeastern Alaska. Mar. Fish. Rev. 35(5):19-22.



Comments of the Alaska Department of  
Fish and Game - Jack Gustafson

Responses to the Alaska Department of  
Fish and Game - Jack Gustafson

**MEMORANDUM**

**STATE OF ALASKA  
DEPARTMENT OF FISH AND GAME**

To: Lorraine Marshall  
Project Coordinator  
Division of Governmental  
Coordination  
Juneau

DATE: November 12, 1993

FILE NO: AK9310-05JJ

PHONE: 225-2027

FROM: Jack Gustafson *KJH (et al)*  
Area Habitat Biologist  
Habitat Division  
Ketchikan

SUBJECT: Polk Inlet Draft EIS

The Alaska Department of Fish & Game (ADF&G) appreciates the opportunity to review the Forest Service's (FS) Polk Inlet Draft Environmental Impact Statement (DEIS). The information and recommendations contained herein are intended for use in the interagency development of a consolidated State response. We look forward to working with your office and other departments in developing that response.

In the DEIS for this timber sale, the FS proposes to harvest approximately 125 million board feet (mmbf) from an estimated 4,400 to 5,200 acres within a 208,649 acre project area. Only 168,934 acres are within National Forest system lands, however. Of this total land base 68,047 acres are commercial forest lands (CFL) which still exist as old-growth. Also at the present time, there are only 27,164 acres of tentatively suitable and available CFL in the project area which are of normal operability (3-76). Approximately 21,975 acres of FS lands within the project area are either clearcuts or second-growth. Nearly 79,000 acres of the FS lands within the project area are non-forested or scrub (3-72), and almost 40,000 acres are lands under non-FS ownership.

According to the DEIS (1-10), about 14% of the project area would be left unmodified or in a near-natural state. These lands include the Old Tom Creek Research Natural Area, beach and estuary fringe, and riparian buffers. This figure, however, seems to conflict with those shown in Table 3-24 which indicate that a total of 12,766 acres, or 6%, of the project area CFL is withdrawn for the Research Natural Area, beach and estuary fringe, and riparian LUDs.

ADFG-1

NEPA COMMENTS

ADFG-2 The results of this timber harvest plan and the cumulative impacts predicted which are of the most concern to this department are the declines anticipated for wildlife populations in and near the project area. For example, following the completion of timber harvest in the current 89-94 operating period, the declines in wildlife habitat capabilities, adjusted for patch-size

The two cited percentages refer to different things/ on p. 1-10 all lands are included and in Table 3-24 only CFL is included. Page 1-10 has been edited and the percentages have been changed to include only nonencumbered National Forest System lands for clarity.

ADFG-1

Comment noted.

ADFG-2

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ADFG-2  
(cont.)

effectiveness (3-116), are represented as follows: deer (33%), marten (28%), red-breasted sapsucker (24%), hairy woodpecker (50%), and brown creeper (57%). The permanent cumulative losses in wildlife habitat capabilities over the rotation are represented in this DEIS (4-89) by the following examples: brown creeper (82%), Vancouver Canada goose (78%), hairy woodpecker (77%), red-breasted sapsucker (63%), marten (55%), Sitka black-tailed deer (54%), black bear (42%), and wolf (40%). These cumulative losses, however, do not reflect effects due to patch size and road densities, and actual wildlife losses are, consequently, likely to be even greater than shown by the preceding figures.

When these losses are combined with a significant reduction in commercially important old-growth in the adjacent FS project areas, along with similar or even more extensive cutting throughout the numerous private land holdings on Prince of Wales Island, it suggests a major reduction of biological diversity in this unique biogeographical province. Southern Southeast Alaska, for example, could contain as many as 50 species of plants not found in other parts of the Tongass, or elsewhere in Alaska (from Hulten 1968, and Muller 1991), and their viability is directly related to the impacts occurring in this portion of the panhandle. Additionally, the wildlife resources within the project area have not been studied extensively and much remains unknown regarding species distributions, genetic variability, habitat requirements, and viability. Consequently, many types of impacts to wildlife species and ecosystem relationships are currently unknown and will remain so without appropriately planned research. Our primary NEPA concerns are as follows:

(1) An insufficient "Range of Alternatives" is presented in the DEIS.

ADFG-3

The Range of Alternatives for this DEIS is unnecessarily constricted, and could be incompatible with the consideration of wildlife and other values. The primary objective of a planning effort such as this should be overall resource management, not the harvest of a pre-determined level of timber volume which may or may not adequately protect other resources. Alternatives should be developed around issues such as wildlife values, biotic capabilities, and sustained yield. These issues should be defined first, and then the alternatives formed.

Because this process has not been accomplished, it could result in a situation which does not provide a clear basis for an environmentally preferred option by the decision-maker and the public. The insufficient range of alternatives is not a Forest Plan issue, because the Forest Plan is so broad that it cannot recognize or analyze issues or concerns unique to this project area. Consequently, the Forest Plan also lacks adequate detail to accomplish the maintenance of important localized needs, such as subsistence, in smaller-scale project areas such as this.

ADFG-3

The alternatives were developed as you recommend; first the issues were defined, and then the alternatives were formed (see the Development of Alternatives section of Chapter 2). The range of volumes in the alternatives analyzed in detail, however, was restricted by the purpose and need for the project.

The Council on Environmental Quality (CEQ) regulations do not provide specific guidelines for the development of the purpose and need for a project. Thus an agency has discretion in determining the purpose and need. The Forest Service exercises its discretion in determining the purpose and need of the Polk Inlet Project to be providing approximately 125 MMBF of timber to contribute toward meeting KPC contract obligations. As stated in Chapter 2, alternatives ranging from 102 MMBF to 195 MMBF along with an unspecified low-volume alternative, were considered in the EIS. Only alternatives meeting the purpose and need were analyzed in detail. The CEQ regulations allow for alternatives eliminated from detailed study to contribute to defining the range of alternatives. The FEIS analyzes in detail a full range of alternative methods of attaining the specified purpose and need. These alternatives are quite different in terms of their spatial arrangements of units and roads.

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ADFG-4

### **ADFG-4 (2) The EIS improperly proposes to harvest designated Wildlife Retention.**

The Forest Service appears to have begun this planning effort assuming that the Revised TLMP would have a ROD by January, 1993, and that the concept of designated wildlife retention would no longer exist. As a result of anticipating a new Forest Plan which never became approved, this DEIS has improperly proposed extensive timber harvesting in designated wildlife retention and extended rotation, thereby failing to correctly implement the requirements of wildlife retention outlined by the current TLMP.

The most recent and definitive guidance for the designation and maintenance of wildlife retention under the present Forest Plan is contained in the Forest Service's "Tongass Land Management Plan Evaluation Report" (Admin. Doc. #139, Nov. 1984). Important pertinent procedures regarding wildlife retention which appear to be violated by the Polk Inlet DEIS are as follows:

- (a) Amendments or revisions to TLMP are needed to change retention acres (pages A-3 and A-4).
- (b) Retained acres should not be included in timber harvest calculations (page A-5).
- (c) "While retained acres can be incrementally adjusted, the "pooling" and redistribution of these acres on a large scale in advance of detailed timber sale planning would defeat the purpose of the method and should not be considered" (page A-6). Additionally, the Forest Service even recognizes the need to adjust the TLMP database each time that even minor changes are made to retention (page A-7).

Presumably, TLMP recognizes that these procedures for "fixing" retention are needed for the life of the Forest Plan so that: (1) particular/important wildlife habitats can be maintained in the short-term; (2) there is some continuity in the effects analysis and short-term cumulative impacts from one interim EIS to another; (3) frequent inconvenient changes to the database as it relates to timber harvest calculations can be minimized; and (4) the continuity and integrity of the TLMP database can be at least minimally maintained until an amendment or revision to the Forest Plan is implemented.

The Ketchikan Forest Supervisor clarified and reiterated these TLMP policies regarding designated wildlife retention in a memo (11/14/84) to the Ketchikan Management Team stating that: (a) old-growth retention is intended as a permanent allocation, although it could be changed by a future Forest Plan (but not a project level EIS), and (b) minor boundary changes/activities could occur, but could not be undertaken without prior consultation with ADF&G.

## Responses to the Alaska Department of Fish and Game - Jack Gustafson

First, note that "extensive timber harvesting" is not being proposed in previously designated wildlife retention areas. The FEIS shows that the acres of previously designated retention proposed for harvesting represent a small percentage of the total. Second, note that harvesting is allowed in extended rotation areas.

The proposed changes to wildlife retention areas are clearly addressed in the FEIS. Maps are included which separate retention and extended rotation areas; these are separated in the tables as well. New conservation strategies are also addressed in the FEIS. These include Habitat Conservation Areas based on Viable Population Committee recommendations, which provide for more extensive wildlife retention areas than were previously designated. These strategies were prepared in consultation with ADF&G. The FEIS also presents maps of these new strategies.



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ADFG-5

ADFG-4  
(cont.)

We have seen no written documentation that these policies have ever been formally changed by subsequent Forest Supervisors, nor could they be without an amendment or revision to the Forest Plan. Additionally, the IDT for the CPOW project recommended against the cutting of retention areas in a memo to the Forest Supervisor on 12/11/91, recognizing that the assumptions of the timber inventory and TLMP are that there will be no timber harvest planned in designated retention areas, which was a decision ratified and documented by the entire Ketchikan Management Team on 3/22/91. ADF&G staff also raised this issue in several meetings with Forest Service staff following the delay to the TLMP revision early in 1993. However, despite the existing policies, the Polk Inlet DEIS proposes to harvest important retention areas that were selected through a cooperative interagency process. Although there are maps showing the location of the previously designated retention (3-119), these maps do not separate wildlife retention from extended rotation. Additionally, the alternatives do not show retention, and they fail to keep designated wildlife retention and extended rotation intact.

Furthermore, it appears that retention acres and those acres included in the timber harvest calculations could overlap in the database for this DEIS, which is contrary to the requirements of the Forest Plan. Consequently, this not only results in the improper and immediate loss of recognized important wildlife habitats which were specifically excluded from previous interim DEIS's, but it also creates false perceptions regarding the remaining timber base. This significant flaw in the DEIS should be corrected in the final FEIS.

### (3) Logging on steep slopes and unstable soils.

The unit plans in the DEIS do not clearly define, as CPOW did, how much logging will occur on slopes of over 75% gradient. Although this relevant information seems to be lacking in this EIS, it does appear that a considerable amount of harvest will occur in such areas. Approximately 27 units are indicated as having very steep slopes and instability problems, some of which are described as: "Slopes to 100% . . . Evidence of instability (slumping) common . . . Unit recommended for helicopter yarding" (Unit 621-308); "Unit has thin soils and steep slopes (75-80%) . . . Slides and windthrow prevalent . . . Recommend helicopter yarding" (Unit 622-208); and "Slopes are very steep, averaging 100% and up to 200% . . . Recommend dropping unit from further consideration due to high mass movement potential" (Unit 622-266). However, despite these initial recommendations, Unit 622-266, which was recommended for deletion, was subsequently designated for clearcut helicopter logging, and Units 621-308 and 622-208, which were recommended for helicopter yarding, are now proposed for conventional cable yarding. The direction given in the current TLMP, however, restricts logging to areas with slopes of less than 75% gradient. FS Admin. Doc. #139 (TLMP Evaluation Report, 11/84), states that:

The commenter reference is to the November 1984 "Tongass Land Management Plan Evaluation Report" which discusses harvest on slopes greater than 75 percent. The 1979 Forest Plan used criteria in this report in determining acres to include in the regulated timber component. Neither the 1979 Forest Plan, nor the 1985-86 Amendment, provide direction for determining suitable timberlands at the project level.

As part of the TLMP Revision process, a revised suitability process was developed. This process underwent internal and external review, and culminated in a methodology for suitability approved by the three Area Forest Supervisor's in June 1988 (see Appendix N of the "Analysis of the Management Situation" for the Tongass Land Management Plan Revision, January 31, 1990). This suitability methodology has been included in both the TLMP Revision DEIS and SDEIS, and the 1989-94 Long-Term Sale FEIS and is referenced in the Polk EIS.

The revised suitability methodology does not include slope per se as a criteria, but rather used soil hazard index as one criteria. The revised determination distinguishes between "very high" and "high" hazard ratings. Very high hazard soils are considered unsuitable. High hazard soils are suitable but require mitigation such as logging systems that provide partial or full suspension.

These criteria were applied by field personnel and by the Interdisciplinary Team. Field personnel were included in Interdisciplinary Team discussions and recommendations on individual units with steep slopes and soil (as well as other resource) concerns. All field comments, as well as Interdisciplinary Team recommendations, are incorporated in the unit cards so that final layout crews are aware of all resource data on individual units. Additional clarifications have been made in many unit cards to ensure that suspension is achieved, even if the logging system has to be modified.

ADFG-5

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ADFG-6

ADFG-5  
(cont.)

"The retained acres are not the only CFL acres which are excluded from the acreage basis for timber harvest calculations. Tongass-wide, a total of 66% of the CFL has not been scheduled for harvest in TLMP . . . This unscheduled CFL includes the above retained acres . . . [and] CFL in LUD's III and IV on slopes greater than 75%." (emphasis added)

We alerted the FS to our interpretation of this portion of TLMP in a meeting earlier this year and asked the planning leader to transmit to us anything which changed or superseded this requirement but, to date, we have received nothing in response. Consequently, it appears that logging on slopes greater than 75% is contrary to the intent and directives of TLMP. It also appears that the acreage basis for timber harvest calculations presented in this DEIS should have excluded all of the acres with slopes greater than 75%. This needs to be corrected in the FEIS, and could significantly change some of the effects analysis from what is presented in the DEIS.

(4) Timber harvest calculations and sustainability.

ADFG-6

The state's review comments on the CPOW DEIS expressed concerns for the lack of a sustainable timber harvest in the project area, as documented in the DEIS, and the resulting social and biological conflicts with other resources (DGC letter to Rittenhouse, 12/23/92). These concerns are much the same for the Polk Inlet EIS. There are also recognized deficiencies in the FEIS and TLMP timber-type data base. Additionally, retained acres (wildlife retention, extended rotation, slopes >75%, etc.) are to be excluded in the timber harvest calculations, which does not appear to have occurred in this DEIS.

TLMP is not only clear in excluding retained acres, but it also requires incorporating the most current timber harvest data into harvest calculations because it recognizes the shortcomings in applying forest-wide harvest calculations to small project areas. Although TLMP databases were to be used as a source of information, they were neither "designed or intended for direct project level use", and TLMP specifically suggests seeking the most current timber data available. TLMP timber harvest data is to be used:

" . . . in conjunction with more current information derived from more recent inventories and studies" (TLMP Amended Winter 1985-86, Admin. Doc. #147, page 201).

We would like to request that the timber harvest calculations and sustainability be accurately presented in the FEIS using all of the most recent, project area-specific inventory data, along with the correct application of the requirements for retained acres.

## Responses to the Alaska Department of Fish and Game - Jack Gustafson

No attempt has been made to evaluate sustained yield specifically in the Polk Inlet Project Area in this EIS. This is a Forest Plan-level exercise and beyond the scope of a Project-level EIS.

Stand exam data for potential harvest units were used to estimate harvest unit volumes and to develop more accurate, site-specific prescriptions for individual units.

The timber type maps were used for timber supply analysis and proportionality calculations because they represent the best inventory data available for Project Area- and management area-wide applications. Stand exam plots were not distributed with the intent of representing the Management Areas or the Project Area. The collection of extensive stand exam data is very expensive and the collection of sufficient stand exam information to adequately represent both the potential harvest units and the Project Area and Management Areas would likely be cost and time prohibitive.

Additionally, the Forest Service believes that, although the timber type maps frequently appear inconsistent with individual stand exam samples, they represent a reasonable approximation of stand characteristics over a large area, such as a project or management area. Stand exam estimates of timber volume and other characteristics are derived from sample plots taken at various points in the field, and can have considerable sampling error. Therefore, one should not make the assumption that whenever there is a difference between the timber type map and stand exam data that the type map is always incorrect.

The Forest Service is currently investigating other methodologies for estimating proportionality in a more accurate and cost-effective manner. These methodologies include the use of photo-point inventory methods and, in the long-term, the use of an Existing Vegetation Resource Inventory (EVRI) which is currently under development.

The treatment of wildlife retention and steep slopes has been modified in the FEIS. Refer to responses to ADFG-4 and ADFG-5.



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	(5) Timber-type database, the verification of volume classes, and the need to harvest in proportion to volume class occurrence.	ADFG-7	See response to ADFG-6.		
ADFG-7	<u>Timber-type database</u> After becoming more familiar with the GIS, we are more concerned than ever about the inaccurate timber-type database being used to monitor compliance with proportionality rules, and about the accuracy of the timber inventory in the area in general. A FS report by James Brickell explicitly states that the FS database is not accurate enough to identify the location of high volume timber on the ground. Prior to developing the FEIS, field surveys should be done to identify locations of high volume timber and verify the actual amount of volume classes 4, 5, 6, and 7 in the project area.	ADFG-8	The tables on page 70 of Chapter 3 and pages 57-60 of Chapter 4 show the acres by volume class for each VCU in the Project Area and within the harvest units of each alternative by VCU. Harvest unit volumes have been estimated by species and for all species for each harvest unit in terms of net and utility volumes based on stand exam data. The purpose of stand exam sampling was to accurately estimate volumes by alternative and gather other site-specific data for the development of integrated silvicultural prescriptions. The sampling program was not designed to estimate the average volume by volume class across the Project Area. Also see the response to SCF-3.		
ADFG-8	<u>Verification of volume classes, and their site-specific locations</u> The FEIS should display the existing acres and board foot volume of each volume class in the area and a confidence interval indicating the accuracy of this data. The documents should also display, for each alternative, proposed harvest in acres of each volume class, and proposed harvest by board feet for each volume class.	ADFG-9	The calculation of proportionality has been refined and the alternatives have been modified to be consistent with TTRA proportionality requirements as outlined in the Forest Service Sale Preparation Handbook.		
ADFG-9	<u>Proportionality</u> The alternatives do not appear to have been developed to comply with TTRA proportionality requirements. For example, according to the proportionality figures presented in Table 4-30, TTRA proportionality requirements are not met under 5 of the 6 alternatives in Management Area (MA) K17, and 4 of the 6 alternatives in MA K18. In addition, 2 of the alternatives in MA K17 and 3 of the alternatives in MA K18 do not meet the FS's own guidelines for proportionality.  In MA K17, if Alternative 3 is adopted, 1,257 acres of low volume timber would have to be harvested before 1 acre of high volume timber to achieve proportionality in subsequent entries. If alternative 5 is adopted, 996 acres of low volume timber would have to be harvested before any high volume timber in subsequent entries. Alternative 2 would require 918 acres and alternative 4 almost 800 acres of low volume harvest to meet the TTRA baseline. The FS justifies a 0.5% deviation from TTRA compliance by asserting that proportions can be made up in subsequent entries. However, page 4-67 of the DEIS indicates that no further timber harvesting is scheduled in MA K17 for the remainder of the long-term contract. Therefore, it appears that none of the alternatives proposed for MA K17 are viable options for complying with proportionality requirements. If the FS proposes disproportionate harvest of high volume old-growth in this entry, it must explain how it proposes to comply with TTRA without another entry.  Even if another entry is scheduled, as in MA K18, deferring harvest of low volume timber to future entries raises significant concerns for effects on wildlife habitat. It also makes those entries less economically attractive and may decrease the likelihood of them ever occurring. We continue to believe that				

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ADFG-9  
(cont.)

proportionality should be achieved during each entry because there are no guarantees that future entries will occur.

ADFG-10

As expressed in State comments on several previous long-term sale EISs (Kelp Bay, SE Chichagof, N&E Kulu, CPOW), the accuracy of TIMYP data for TTRA proportionality requirements is clearly a question of considerable concern to the State. The main objection is that the TIMYP database contains significant variation in volume estimation and classification on a site-specific basis. The State has requested that project area monitoring plans include methods to critically test the reliability of the TIMYP database to actual unit harvest volume (State comments on CPOW DEIS). A monitoring plan should be included that measures actual harvest unit volumes and compares them to what TIMYP maps predicted they would be. Such an effort would contribute to resolving our concerns about whether or not proportionality objectives are actually met. Also, the proportional harvest rule should be applied to each of volume classes 6 and 7, not to those classes combined as indicated in the TIMP Revision DEIS. Combining those classes risks the disproportionate harvest of Volume Class 7.

Additionally, TTRA refers to "volume classes 6 and 7 as defined in TIMP". In TIMP, volume classes 6 and 7 are defined as having greater than 30 mbf/acre. The Central Prince of Wales FEIS indicated that stands mapped as volume class 5 in the Polk Inlet project area may average more than 30 mbf/acre inventory scale. It thus seems that some stands mapped as volume class 5 in the project area are, by TIMP's definition, actually volume class 6 stands. Therefore, these higher volume stands mapped as class 5 must also be harvested proportional to their occurrence in the management area. The information in the CPOW FEIS seems to confirm our concerns about the inaccuracy of the TIMYP database.

### (6) Rare plant surveys.

Although the botanical resources of the southwest quarter of Southeast Alaska are very different from the rest of the state, few surveys for rare plants have been accomplished in this area. At least one rare species, *Glyceria leptostachya*, has been previously collected near Control Lake, adjacent to the project area. Two other plants, which are "species of concern" (critically imperiled in Alaska because of extreme rarity) were also located within the project area during the field work of the harvest Unit #620-349, and *Vaccinium oxycoccus* was located immediately adjacent to Unit #622-271. Additionally, the northern limits of some plant species extends only as far as POWI. The northern extent of the range of Pacific yew (*Yew brevifolia*) in North America, for example, ends in or near the project area, and yew trees at this extreme limit of their range are unique in that they are reported to contain higher concentrations of taxol than their more southerly counterparts.

ADFG-11

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ADFG-10

Refer to response to ADFG-6. Also, note that the TTRA, as indicated by the General Accounting Office audit of Forest Service implementation, provides for combining volume classes 6 and 7 for purposes of measuring the single proportion which these classes comprise of the total timber base in a Management Area and the portion of that area that is harvested. The measure of compliance under the statute is only this proportion, not the total volume in each class.

ADFG-11

Plants were surveyed during field reconnaissance by field crews including botanists and other resource specialists with interdisciplinary training. These surveys are described in the Timber/Vegetation Resource Report (Mehrwien et al. 1993).

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ADFG-11  
(cont.)

Information contained in various references indicate that there could be up to 50 species of plants known or suspected to occur in Alaska which are found only in the southern part of the Southeast portion of the state. The impacts to rare or unique plant species due to on-going habitat losses within the project area are unknown, and will remain so unless the appropriate botanical field surveys and inventories are planned and implemented. It is necessary to obtain this information for the FEIS, prior to another large-scale entry into this project area.

### (7) Wildlife Surveys.

ADFG-12

Wildlife surveys, especially for goshawks, falcons, murrelets, sandhill cranes, and Vancouver geese should be conducted in the project area to locate important habitats. Nesting surveys should be conducted during the prime nesting period for bird species. Road, camp, harvest unit, and ancillary facilities will need to be located and designed to prevent the destruction and/or disturbance of nests and other important habitats.

There also appears to be a small but unique population of sandhill cranes which nest and forage in Southeast Alaska. Some of these cranes are located in the project area. As nesting sandhill cranes in Southeast Alaska are a rarity, their important nesting and foraging areas should be identified and the appropriate protection measures implemented.

### (8) Marbled Murrelets.

ADFG-13

We are aware that Ebasco has done some marbled murrelet surveys in the Control Lake project area and we compliment them for the excellent work accomplished thus far. Of the 27 potential harvest units surveyed, murrelets were detected in 96% (26) of the stands and occupancy behaviors were noted in 41% (11). The number of birds detected in stands (where detections were noted) ranged between 2 and 120, and averaged 44. The number of murrelets detected in stands where occupancy behaviors were noted were much higher, ranging between 25 and 120 and averaging 70. However, we also note that occupancy could occur in stands currently not designated as "occupied," because the survey protocol requires the surveys to be conducted for two consecutive field seasons.

The murrelet eggshell fragments found in Units 621-299, 621-254, and 613-202, and the nest found in 1992 indicate significant use of this project area by nesting murrelets (4-99). Consequently, we would encourage the FS to initiate this type of survey, using the appropriate protocol, within the Polk Inlet project area so that standardized results can be obtained and the data can be compared to that collected elsewhere.

We agree with the DEIS that "populations of northern goshawk and marbled murrelet may experience significant long-term cumulative effects," and that "within the Polk Inlet Project Area, the

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ADFG-12

Wildlife surveys were conducted during field reconnaissance by field crews with interdisciplinary training. As a result of these surveys, many observations of wildlife or their sign were recorded. Species recorded included goshawks, marbled murrelets, sandhill cranes, and Vancouver Canada geese, among others. Appropriate mitigation measures were designed to avoid or minimize impacts. In addition, the Craig Ranger District conducted goshawk surveys within the Project Area during 1993 and 1994. Additional opportunities for wildlife observations and mitigation will occur during unit layout.

ADFG-13

As noted in the response to ADFG-12, the Craig Ranger District conducted additional goshawk surveys within the Project Area during 1993 and 1994. Results of these surveys have been incorporated into the FEIS. Although the effects of long-term harvesting in the Project Area on the marbled murrelet may require additional study, we believe that sufficient information is available to predict the effects of the Polk Inlet Project.



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ADFG-13  
(cont.)

combination of reduced nesting habitat and predation are projected to reduce marbled murrelet populations in the long-term" (4-107). However, the extent of these declines needs to be more precisely analyzed in the FEIS, and to do so will require additional field research on these "Category 2" species within the project area.

### (9) Goshawk Management.

The goshawk population in Southeast Alaska has recently been the subject of a status review by the U.S. Fish and Wildlife Service (USFWS). Consequently, the concerns expressed for this Category 2 species are much the same as for murrelets.

The most important long-term issue is that cumulatively, within the 208,649 acre Polk Inlet project area, only about 14% of the commercial forest lands within National Forest ownership (23,650 acres) are reserved from timber harvest (Summary, pg. 7), but current Forest Service goshawk management guidelines retain only 20-30 forested acres around known nests. As expressed in previous meetings and correspondence, simply protecting known nest sites without maintaining foraging habitat probably won't conserve goshawks in Southeast Alaska. If enough goshawk foraging range is left intact, however, there will probably also be enough areas available for potential nest sites.

Focusing just on nest sites is a major problem because: (1) nests are extremely difficult to locate prior to cutting, (2) surveys/sampling to find nests is of questionable effectiveness, and (3) this approach fails to protect foraging areas and other critical parts of the home range. Both the "Viable Population Committee" and the attendees at the "Interagency Goshawk Management Meetings" (December 10-11, 1992) agreed that goshawk management standards and guidelines need to incorporate a broader landscape-based strategy based on the conservation biology principles of maintaining large blocks of suitable old-growth forest habitats that are well-distributed throughout the various provinces/subprovinces. The 1993 draft Viable Population Committee strategy states these old-growth forest blocks should be large enough to maintain eight pairs of reproductively active goshawks. The Habitat Conservation Areas (HCA's) identified in the Polk Inlet project area appear to be too small (based upon the telemetry relocation data) to accommodate the desired number of goshawk pairs. Over the rotation all but about 23,850 acres of the commercial forest lands within the project area will be cut. The remaining foraging habitat will exist within a highly fragmented landscape totalling nearly one-fifth of one million acres. Similar harvest levels are planned over approximately another 3 million acres of adjacent Forest Service project areas and private lands throughout the southwest quarter of Southeast Alaska.

It was also discussed at the interagency meeting of December 11, 1992, that current goshawk management guidelines are ineffective because they do not adequately address the loss of foraging habitat or the protection of important foraging areas within the home ranges. As the USFWS (10/16/92) and others have pointed

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ADFG-14

We agree that the most effective way to mitigate impacts on goshawks is to minimize impacts to their habitat. A strategy founded upon the basic conservation biology principles of maintaining large blocks of forest habitats that are well distributed throughout the Tongass, such as the Viable Population Committee recommendations, appears to provide this habitat protection. The FEIS has been modified to incorporate a revised old-growth retention strategy which includes the maintenance of large old-growth blocks. This strategy is based on the Viable Population Committee HCA recommendations.



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ADFG-14  
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out, the present guidelines are from an "in house" Forest Service document which has not undergone peer review and has not received the endorsement of the other resource management agencies. Additionally, as there are no data which justifies the current guidelines, they remain lacking in credibility, and we question their applicability and effectiveness. Until the Forest Service establishes guidelines that meet interagency peer acceptance, we concur with the USFWS's Biological Assessment of CPW (4/9/92) that the present plan is inadequate and only further jeopardizes the viability of this Category 2 species.

Additionally, we also endorse the goshawk comments previously made by the USFWS concerning the S.E. Chichagof Timber Sale EIS (9/23/92), the CPW Biological Assessment (4/9/93), and in their letters to the Forest Service on 10/16/92, 3/4/93, and 5/12/93. We suggest the recommendations made by the USFWS in this correspondence also be incorporated into the decisions for this planning effort.

**(10) Franklin's grouse.**

ADFG-15

Franklin's grouse occur within the project area, but have never been studied to determine their habitat requirements in Southeast Alaska. When Franklin's grouse are evaluated for viability and distribution concerns using the "VPOP" Committee methods, however, this species receives a total score of 139 out of 174 possible points, or 80%. This would give it a ranking at or near the top of those species thought to have viability or distribution concerns. Franklin's grouse typically occur in drier habitats, though, and very little is known of their natural history within this ecosystem. To our knowledge, only one nest of this species has been found and subsequently documented in Alaska. It was discovered on May 27, 1903, by Osgood "situated on the ground in deep woods" near the head of Twelve-Mile Arm, located within the Polk Inlet Project Area. Additionally, a single sighting of Franklin's grouse occurred within the project area by project personnel two summers ago. This female with chicks was located in Unit #624-230. Coincidentally, this could be within a couple of miles of where, in 1903, Osgood discovered the only Franklin's grouse nest known to have been found in Alaska. The FS needs to provide assurances that their planned activities adequately provide for the needs of this species prior to another large-scale timber harvest within the project area.

**(11) A scientifically credible plan for maintaining viable and well distributed populations of wildlife.**

ADFG-16

After describing the Interagency Viable Population (VPOP) Committee recommendations to insure viable and well distributed populations of wildlife through a system of Habitat Conservation Areas (HCAs) (pages 3-117 through 3-120), the DEIS fails to adopt any of its recommendations or provide a scientifically credible alternative method for insuring viable and well-distributed populations, as required by the National Forest Management Act.

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ADFG-15 The FEIS has been revised to address project effects on the Franklin's grouse.

ADFG-16 The Polk Inlet Project strategy for contributing to the maintenance of viable and well distributed wildlife populations throughout the Tongass has been substantially revised in the FEIS. See response to ADFG-14.

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ADFG-16  
(cont.)

Rather, the discussion on pages 4-115 and 4-116 is confined to detailing how the few and small remaining blocks of old-growth wildlife habitat will become fewer, smaller, and more isolated as a result of the proposed action and subsequent timber sales. The VPOP committee recommended two medium HCAs and part of a third be established in the Polk Inlet project area. Although the VPOP committee's recommendation was only one possible example of implementing its strategy, the proposed action appears to be foreclosing on options to institute any effective strategy in the Polk Inlet area. Although viable, well-distributed populations of wildlife do not have to be maintained on as small a scale as the Polk Inlet project area, the Forest Service must demonstrate how the Polk Inlet sale would fit into an overall strategy for the North Prince of Wales ecological province. We suggest that the recommendations of the VPOP committee, and the associated reviews, be presented, discussed, and adopted in the forthcoming FEIS/ROD.

In a variation of this, large old-growth blocks and corridors were also identified in the draft TLMF revision of 1990. This alternative conservation biology strategy, emphasizing 5,000 acre blocks and connective corridors, should also be presented and discussed. At least one alternative should incorporate and analyze the 5k/24 blocks as prepared for the Craig Ranger District in December 1990. These areas should also be described and shown graphically on maps.

### (12) Impacts of camp personnel on wildlife in project area.

The FEIS should address the consumptive impacts of wildlife harvest by FS and other camp personnel which are brought to the project area as a result of the proposed activities. We understand that current policy allows federal employees the use of government equipment and facilities (trucks, aircraft transport, and camps) to pursue and kill wildlife during their off-duty hours. The FEIS should analyze the biological impacts of this and also provide a discussion of the ethics policies which may be involved. Are some species, such as bear, wolf, steelhead, yellow-eye red rockfish, halibut, etc., sensitive to intensively localized harvest pressures? Is it ethical for employees working on project activities during the day to learn where game animals are likely to be encountered, and then take government vehicles back to these areas to shoot deer, bear, or wolves while off duty, perhaps followed by transporting the meat and hides away from field camps on government-chartered aircraft? Could some of the activities or actions associated with the consumptive use of natural resources by employees working out of camp facilities be viewed unfavorably by the public or peers? At what point does such conduct become inappropriate, or unacceptably impact scarce or valuable fish and wildlife resources? In this analysis, project planners may want to examine the policies implemented during construction of the Trans-Alaska Pipeline System, which prohibited consumptive harvest by both government and non-government project employees. Ethics policies of other agencies, such as those of ADF&G, also address these issues in a thoughtful and deliberate manner.

ADFG-17

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ADFG-17

Forest Service policies regarding hunting and fishing from remote camps and the use of government property are defined in Section 6179.02 under Title 6100 - Personnel Management - of FSM 7/82 KA Supp. 31. The effects of harvest by camp personnel are local and relatively short term and are included within the effects describes in the FEIS Wildlife section. Effects on subsistence activities of camp residents are also addressed.

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(13) Analysis of effects on wildlife.

The entire section on deer population objectives should be changed prior to the FEIS. It is not appropriate to display "project area [population] objectives" for deer as table 4-40 does. ADF&G does not have project area objectives, but rather WAA objectives. Assigning objectives to portions of the WAA based on percentages of the WAA within the project area is inappropriate. In the case of WAA 1317, timber harvest would reduce habitat capability below ADF&G population objectives for the WAA. The FEIS analysis should show ADF&G objectives for each WAA along with habitat capability for the entire WAA. If project actions reduce habitat capability below the objectives, that should be noted. The updated TUMP 1990 habitat capability and ADF&G objectives for project area WAAs are as follows:

WAA	1990 Hab. Capability	ADF&G Objectives
1107	6,935	5,201
1213	1,199	900
1214	1,716	1,287
1317	1,106	1,106
1332	2,617	1,963

It appears that only in WAA 1317 will actions of the proposed alternatives reduce the habitat capability below ADF&G objectives. However, habitat capability calculations should include patch size effects. The analysis presented in the DEIS does not.

We appreciate the patch size analysis for wildlife presented on pages 3-111 through 3-116. Patch size factors were always intended to be important aspects of the habitat capability models. Unfortunately, the adjusted habitat capabilities presented in Tables 3-43 and 4-56 were not applied throughout the environmental effects sections of the DEIS. Patch size effects should have been included in all DEIS tables showing habitat capability. Had they been, greater effects on wildlife and wildlife users from the timber sale would be displayed in the document. The DEIS shows 1994 deer habitat capability as being 36% (900 animals) higher than if patch size effects are considered. By not including effects of forest fragmentation in the subsistence analysis, the DEIS predicts about 90 more deer would be available to hunters in the project area than is likely. For marten, 1994 habitat capability is shown as 17% (27 animals) higher than if patch size effects are considered. This does not include the effects of roading on marten (see below). Tables 4-39, 4-40, 4-43, 4-51, 4-52, 4-53, and 4-54 should incorporate patch size effects in the habitat capabilities. This should also be done in tables 4-76 and 4-81 through 4-87 in the Subsistence section. Although we realize it is not possible to calculate patch size effects for future timber sales, tables depicting cumulative effects (eg. 4-54, 4-76, 4-87) should incorporate patch size factors in current habitat capability. Future

ADFG-18 The section on deer population objectives has been changed in the FEIS as requested.

ADFG-19

The presentation of habitat capabilities has been revised to incorporate patch size effects more completely throughout the analysis.

ADFG-18

ADFG-19



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ADFG-19  
(cont.)

declines in habitat capability would then be calculated from a base that incorporated patch size and would thus be closer to actual patch size capability than what the tables currently show.

ADFG-20

Tables 4-39 and 4-40 should show effects of proposed actions beyond 1997 to 2027 when the second-growth canopy closes in and forage for deer and black bears is unavailable. These are direct and irreversible effects of the Polk Inlet project, and habitat capability will decline further in the project area even if no future harvest entries occur. This decline is not clearly presented anywhere else in the DEIS.

ADFG-21

No alternative seems to take into account the loss of habitat on neighboring private lands. Although extensive logging on private lands is mentioned in the DEIS, there is no evidence that it has affected any planning decisions in the document.

ADFG-22

### Subsistence

It is inappropriate and meaningless to discuss populations in portions of WAAs that are so small that they lack the habitat base to support a viable population of animals. The numbers given as "Population Needed to Support Harvest", tables 4-76, and 4-80 through 4-87, in the subsistence section, may be the result of an interesting mathematical exercise, but they have no relation to the reality of species population biology. To assert, as the tables do, that as few as one animal is needed to support a sustainable harvest of a species is rather absurd. That reasoning ignores the need for enough animals to constitute a viable population. It may be appropriate to discuss how much habitat capability for a species will be decreased in the portion of a WAA in the project area, but it is wrong to imply that a sustained harvest can come from as few animals as exist in the portions of WAAs 1107 and 1332 which occur in the project area.

Wildlife harvest tables in the subsistence section are confusing and do not appear to take advantage of the most site-specific harvest information. Tables 4-83 through 4-87 all list the same harvest database as their source even though not all of them refer to martens. This needs to be corrected. The FEIS needs to present actual harvest numbers in tables 4-74 through 4-76 and 4-80 through 4-87 besides a "population needed to support harvest". The EIS should indicate what sustainable harvest rates were assumed for each species in calculating "population needed to support harvest". We recommend 10% for black bear, 20% for otter, and 40% for marten. Although ADF&G was used as the source for harvest levels, we cannot match the numbers in our harvest database with those given in the DEIS, assuming the above sustainable harvest rates. Either different harvest rates were used or the discrepancy is the result of the method used for calculating harvest, as described in footnote 1 in all the tables. ADF&G has site-specific harvest data for bears and furbearers down to the drainage (VCU) level. Such site-specificity probably makes it unnecessary to apportion harvest by percent of WAA habitat capability, which is unreliable because

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ADFG-20

The longer term effects of the Polk Inlet Project implementation on deer and black bears are presented by decade through 2054 under the cumulative effects analysis. This incorporates the reduction in habitat capability due to canopy closure.

ADFG-21

All alternatives have considered the loss of habitat on neighboring private lands. This is documented in a number of locations including the Development of Alternatives section in Chapter 2, the Mitigation Through Avoidance of Geographic Areas section in Chapter 2, and the Landscape Level Mitigation section under Wildlife in Chapter 4.

ADFG-22

The referenced tables were not intended to imply that a sustained harvest can come from the portions of each WAA within the Project Area. They were intended to focus on the specific effects of the Polk Inlet Project on the portion of each WAA within the Project Area. The source references for the identified tables have also been corrected. The subsistence analysis has been modified so that it is based on the full WAA in the FEIS. The assumed sustainable harvest rates, which are the same as recommended, were identified in footnotes to the corresponding Chapter 3 tables in the DEIS and have been added to the Chapter 4 tables in the FEIS. During preparation of the FEIS, our contractor sought to obtain the referenced VCU-specific harvest data for black bears and furbearers from ADF&G, but was informed that the harvest by WAA should be used instead because harvest was either entirely within or outside of the Project Area for each WAA. This information has been incorporated into the FEIS.



ADFG-22 (cont.)	Lorraine Marshall 14 November 12, 1993	hunting areas do not always correlate with habitat capability. We informed the contractor of the levels of bear and furbearer harvest reporting during the DEIS preparation period and offered to provide more detailed harvest locations than WAAs, but were told that WAA level data would be sufficient. We recommend the FS and contractor utilize the more localized data for the FEIS analysis.
ADFG-23	ADFG-23	The effects of road density have been incorporated into the black bear habitat capability model results in the FEIS.
ADFG-24	ADFG-24	The access management plan presented in the DEIS was summarized for each road segment by alternative on pages 125-126 of Chapter 4. Further, the specific plan for each road segment was identified in Appendix D by road number. The road design cards in Appendix F also define the access strategy for each road segment by road number.
ADFG-25	ADFG-25	The analysis of project effects on martens has been refined in the FEIS in consideration of these comments. The access management plan has also been reviewed in light of these comments and the alternatives have been refined with these comments in mind.
ADFG-24		<b>Roads</b> The road access management plan is confusing as presented and appears to be inadequate from a wildlife standpoint. A better presentation would be to produce maps like those in the 1989-94 FEIS which outline specific areas and their prescribed access.  Road closures to benefit martens should be planned in a more systematic way than appears to be the case for this project. Ideally, access to the center of a block of habitat would be restricted to provide a refugia for marten populations, whereas peripheral access would be retained so that trappers may utilize, but not overharvest, the population.  The DEIS does not present evidence to support the contention that access management would reduce the detrimental effects of roads on wildlife. It is unclear if the road closures proposed are sufficient to reduce the density to a level that mitigates effects on martens. The FEIS should display what road densities would be with the proposed access management plan and calculate their effect on marten habitat capability. The results of those calculations should replace the habitat capability currently used in the subsistence section tables showing number of animals available for harvest.
ADFG-25		Table 4-45 is sobering. It indicates that when effects of roads are taken into account, marten populations in WAAs 1214 and 1317 could be in danger of extirpation. Whether or not all the roads in the project area are connected to the island road system is immaterial. If roads are not closed, trappers using ATVs transported to a system by boat, can produce the same effects as would a continuous road system. Unless roads are closed to ATVs as well as highway vehicles, the effects depicted in table 4-45 may occur in spite of the access management plan.

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ADFG-25  
(cont.)

The risk to martens from road access also exists during logging operations. Because of their proximity and easy accessibility to the project area, logging camp residents' effects on wildlife populations are likely to be greater than those of other rural and nonrural users. Logging camp residents trap and have access to road systems during project operations. Consideration should be given to restricting trapping opportunities of logging camp residents while logging operations are underway. A precedent for camp prohibitions against hunting and trapping was set by the Greens Creek mining operation on Admiralty Island. Similar prohibitions should be considered for this and other large scale Forest Service projects.

ADFG-26

There is no discussion of roading effects on black bears in the DEIS even though the black bear habitat capability model includes reductions for disturbances from roads, logging camps, ferry terminals, trails, etc. As mentioned earlier, it appears that these reductions were not considered in the DEIS. The FEIS should apply these factors to black bear habitat capability determinations.

ADFG-27

In regard to the last sentence on page 4-79, the federal government has recently assumed management responsibility for subsistence use of wildlife on federal lands, including setting trapping regulations. This no longer is the responsibility of ADF&G.

ADFG-28

### Forest Fragmentation and Patch Size Analysis

We are pleased that the IDT delineated and buffered old-growth blocks to display areas of interior old-growth conditions for past, present, each alternative, and foreseeable future. Buffering for interior forest conditions helps differentiate areas that function as blocks from narrow isthmuses and strips that are more corridors than blocks. Figures 4-17 through 4-23 are too small to be very useful for reviewers, however. Larger maps would improve readability as would the use of shading to differentiate blocks of various sizes as was done in the CPW FEIS.

ADFG-29

The histograms in Appendix C are not useful. They display percent of existing (uncut) forest in various size old-growth blocks. This results in Alternative 3 having a higher percentage of forest in 1,000-5,000 acre blocks than Alternative 1 even though Alternative 3 has 4,800 acres less of forest. Instead, percent of all commercial forest land (cut as well as uncut) should be displayed for each alternative.

ADFG-30

In addition to displaying the number of blocks of various sizes and the percentage or number of forested acres in these blocks, the FEIS should show edge-to-area ratios for each block in excess of 1,000 acres. Edge-to-area ratios would be a more sensitive index of fragmentation within blocks than simply listing numbers of blocks and acres.

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Refer to response to ADFG-23.

The indicated correction has been made in the FEIS.

Comment noted. Larger maps are in the planning record.

Comment noted. The figures need to be reviewed with the total old growth in mind.

As with most biological analyses, there are many ways to present results.

The purpose of presenting the areas of interior old-growth patches by subtracting the areas in edge buffers is to provide "...a more sensitive index of fragmentation within blocks than simply listing numbers of blocks and acres." We believe this is a better method than calculating edge-to-area ratios (which are more difficult to interpret and not as intuitive) for quantifying the degree of fragmentation.



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ADFG-31

The patch size effectiveness analysis in the Polk Inlet DEIS is a good beginning at incorporating the effects of fragmentation on some wildlife species. However, the weighted average approach used by these analyses to arrive at an effectiveness percentage lacks precision and probably overestimates the habitat value of the old-growth patches remaining. By this method, the quality of habitat in remaining patches is assumed to be equal when it is likely that the best habitat has been more heavily fragmented than lower quality habitat. Ideally, the patch size effectiveness curve values from the habitat capability models (Table 3-42) should be multiplied by the habitat capability of each patch. The product of those values would be a more accurate estimate of fragmentation effects on habitat capability.

ADFG-32

Precommercial thinning

We are disappointed to see precommercial thinning once again portrayed as mitigation for wildlife. On pages 2-37 and 4-95, mitigation measure W6 calls for thinning for wildlife on an "experimental basis". Experiments do not constitute mitigation unless they are successful. Though we do not object to such an experiment, it should not be called mitigation until the results indicate that it is effective.

(14) Riparian management and fisheries/wildlife concerns.

ADFG-33

We are concerned that approximately 14% (3,730 acres) of the riparian zones in the Project Area have previously been harvested and that some watersheds have already lost up to 72% of their riparian buffers (Table 3-14). According to the DEIS, some of the most heavily impacted watersheds in which riparian timber harvesting has occurred include: Maybeso Creek (50% of the riparian areas harvested), Harris River (36%), Cable Creek (67%), Twelvemile Creek (72%), Camp Creek (20%), and Beaver Creek (18%). However, with the exception of the Maybeso Creek and Harris River watersheds, additional timber harvest is scheduled to occur within these watersheds without adequate watershed analyses (Bartos, 1993). This deficiency is significant in that the hydrologist whose data is being used to establish acceptable harvest levels in watersheds claims that his site-specific study is being misused when it is categorically applied as a generic harvesting threshold for all watersheds (Louis Bartos to David Rittenhouse, 1/2/93).

ADFG-34

Given the extent of past riparian timber harvesting within the Project Area, it is essential that the remaining riparian areas and fisheries habitat values be maintained. Logging on steep slopes, soil stability, road building activities, stream crossings, impacts to riparian areas, changes in water quality, drainage-wide changes in hydrologic regimes, and impacts to the ecology and/or productivity of aquatic resources are examples of important coastal consistency concerns related to the maintenance of fisheries habitats. Other persistent concerns include: (1) improper methods of determining stream buffer measurements (the state's Forest Resources and Practices Act Regulations require

ADFG-31

It is necessary to maintain some degree of reasonableness in deciding the analysis method to be used in an EIS. The "ideal" method of analysis is often unrealistic in terms of the cost and time required. We believe that this is such a situation. For example, developing habitat capability estimates based on individual patch habitat capabilities would require 711 habitat capability calculations (one for each patch) for just one species under Alternative 3. This does not include the calculation of habitat capability for all areas outside of old-growth patches. It is easy to see how this would need to be expanded to many thousands of calculations to cover all species and all action alternatives, no-action alternatives, and 1954 conditions. The lack of precision in the species-specific patch size effectiveness curves which would be used to adjust habitat capabilities does not justify this level of investment.

ADFG-32

Precommercial thinning, especially variable-spaced thinning, are commonly recommended as a means of improving habitat characteristics of young forests in northwestern North America (Spies et al. 1991, McComb et al. 1993). In addition, there is considerable evidence to indicate that some types of precommercial thinning can improve wildlife habitat conditions relative to no thinning in Southeast Alaska (Doerr and Sandburg 1986, DellaSala et al. 1994). More data are needed relative to the thinning spacing, frequency of thinning, and slash treatment required to produce benefits and the degree of benefits achieved.

ADFG-33

BMP 12.1 provides direction for cumulative watershed effects (CWE) analysis as part of the NEPA process that includes utilizing a screening and/or analysis process. The cumulative watershed effects (CWE) analysis in the DEIS meets this direction. The screening process is used to determine watershed sensitivity because of a lack of intensive data for the watersheds in the Project Area. The threshold is derived from existing studies and information as discussed in the DEIS. Numerous other studies besides Bartos (1989) are used in determining this threshold as referenced in the EIS (see also Forest Service 1991a). All watersheds meet the defined thresholds for percent ground disturbance in the overall watershed and for high gradient contained channels. This analysis satisfies the CWE direction of the Best Management Practices. The procedure used the watershed as the site-specific area of analysis, and incorporates watershed-specific disturbances from past, proposed, and private-land actions. In addition, the analysis took into account the updated stream information that resulted from intensive and extensive site-specific reconnaissance in all harvest units and how this increase in stream length related to the whole Project Area. The use of thresholds based on available studies is a common watershed analysis approach. Past effects to riparian areas within the watersheds has been incorporated and are also discussed in the riparian, fisheries, and wildlife sections of the EIS. This analysis meets the standards of NEPA and NFMA.

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horizontal distance, rather than the slope distance measurements used by the FS (DEIS, 3-231), (2) the blow-down of stream buffers which are too narrow in width and, (3) the lack of authority granted to fisheries field biologists for designing buffers of greater than 100 feet in width.

In the 1989-94 EIS, it was recognized that many channel types need greater than 100-foot buffers to maintain adequate stream and riparian protection. Lower valley bottom channels, in particular, require buffers wider than 100'; these areas also provide valuable wildlife habitat. Unit plans should implement expanded buffers on those channel types which require greater than 100-foot setbacks, as identified either in the 1989-94 FEIS/ROD or, preferably, through more thorough, site-specific watershed analysis. In addition, each unit plan in the FEIS should clearly explain what management activities and protective measures will be implemented in the 300-foot riparian management zones (RMZs) of each Class I and tributary Class II stream. As these areas are also important to wildlife, the FEIS should indicate which RMZs provide the highest quality wildlife habitat. A Habitat Suitability Index (HSI) value of greater than or equal to 0.7, on a scale of 0-1, should be used to determine the highest quality habitat for marten, otter, black bear, Vancouver Canada goose, bald eagle, and, as indicator species, the brown creeper and hairy woodpecker. An HSI value of greater than or equal to 0.43 should be used to determine the highest quality habitat for deer. Once identified, these areas should be reserved from logging to provide future options for developing an effective wildlife conservation strategy.

ADFG-35

### (15) Rooding and fisheries mitigation.

Although the Road Design Cards for this DEIS are a vast improvement over those for the CPW and North Revilla FEISs, they lack important descriptions of the types of fisheries habitat that will be impacted by the proposed stream crossing structures. For example, how much Class I spawning habitat will be eliminated by culverts? In addition, they do not identify under which alternative each road will be constructed, but rather, leave it up to the reviewer to determine which or what portions of the roads displayed apply to each alternative. We would request that the Polk Inlet FEIS incorporate the format of the road cards contained in the North & East Kuiu FEIS, which are excellent examples of the type of site-specific information needed to assure consistency with the ACPM and compliance with the state's Title 16 statutes.

ADFG-37

We are pleased to see that the DEIS has attempted to incorporate the standard ADF&G timing windows for instream work. However, we note some discrepancies between the timing windows proposed versus those typically required by this department under Title 16. Specifically, instream work for those systems containing steelhead trout should be restricted to the period of July 18 to August 15, and not to the June 1 to September 1 window identified

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ADFG-33  
(cont)

Besides the mentioned CWE, the EIS also analyzed the relative risk of potential effects to class I, II, and III streams based on the quantity, type, and location of stream buffering (Figure 4-4). The factors considered were the length of all treated streams and whether they received one-sided, two-sided, or no buffers. These effects included risks to anadromous fish, resident fish, and downstream water quality.

ADFG-34

Extensive field reconnaissance of harvest units resulted in the identification of additional streams from those originally in the GIS database. All streams were channel-typed and had site specific Best Management Practice (BMP) mitigation measures recommended. Besides the required buffers (see Appendix C, Table C2a) numerous extended-width buffers were recommended based on site-specific observations and the TLMF Draft Revision standards and guidelines. Extended-width buffers are documented in Table 4-9 of the EIS and on the unit cards. Buffers were also recommended on some class III streams in watersheds that had high levels of past harvest in order to minimize future effects on riparian zones and provide a source of large woody debris. The effectiveness of these stream buffers and BMP's are discussed in the Mitigation section of the Water, Fish, and Fisheries section (Chapter 4). Blowdown effects on stream buffers are specifically addressed under Mitigation in the Wetlands, Floodplains, and Riparian Areas section and under Fish Habitat in the Water, Fish and Fisheries Section of Chapter 4. The Forest Service has recently agreed to measure minimum buffer widths during final unit layout using horizontal rather than slope distance for Class I streams and Class II streams flowing into Class I streams.

ADFG-35

The unit design cards indicate all management activities and protective measures planned for each unit including all riparian areas. As noted in the response to ADFG-34, buffer widths along Class I and tributary Class II streams are a minimum of 100 feet horizontal distance, but are frequently extended well beyond this minimum. A wildlife conservation strategy is presented in the FEIS, but it does not include expanding buffer widths based on the rather imprecise HSI model results.

ADFG-36

The general type of fisheries habitat that will be affected by road stream crossing is indicated by the stream class and is documented in Table 4-11. Best Management Practice 14.17 provides direction for Bridge and Culvert Design and Installation. BMP 14.17 directs that stream crossing structures shall be designed to provide the most efficient drainage facility consistent with resource protection, importance of the road.



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in the Road Design Cards. In addition, timing windows should be employed for culvert installations or other instream work within Class II streams that may result in sedimentation of downstream anadromous spawning habitat. The DEIS does not contain this provision.

### (16) Polk Inlet EIS Scoping Revision.

ADFG-38

In a September 15, 1992 letter to the FS, ADF&G indicated that the revised scoping letter of July 27, 1992 was not accompanied by a map depicting the areas or sale programs it discussed. Consequently, we thought this confused rather than clarified the boundaries of the project area and the project's intent. We were told that this revised scoping would be further clarified and supplemented by a relevant map, which we never received. Consequently, we were not able to adequately respond to this project during the scoping process. The "Purpose and Need" of the DEIS continues to confuse this issue, and we recommend that this be clarified by accurately depicting the amount and locations of sales which will go to satisfy the contract requirements, and those which will be assigned to independent bidders. This is relevant to habitat issues in other project areas, because cutting levels in these areas are determined to a large extent by how contract volumes are distributed forest-wide.

### (17) Caves.

ADFG-39

There could be considerable significant cave resources located within the project area. Caves may contain unique contemporary biota, or paleobiological records of importance. This FEIS needs to evaluate potential threats to cave resources and assure that caves and their scientific values will not be damaged by project activities.

It does not appear that the DEIS adequately addressed this issue. During the project field work, karst or cave features were observed in potential harvest units in VCUs 624, 674, and 675. Additionally, sinkholes were found on the west side of Cannery Creek in VCU 674 at the base of a massive cliff (3-11). Cave Creek, stream #102-62-73, is also known to have karst topography and potential cave resources. It appears that no-cut buffer zones around significant cave features and their localized surface water contributing area will constitute the site-specific protective measures, but the DEIS recommends no project-specific monitoring. It appears additional surveys, mitigation measures, and monitoring should be committed prior to the ROD.

### (18) The need to defer timber harvest in the Indian Creek Watershed.

ADFG-40

The Indian Creek watershed has experienced limited amounts of harvesting in the past and, as such, currently exists as one of the least fragmented and most important unencumbered wildlife and fisheries habitats in the Polk Inlet project area. Varying

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(cont)

legal obligations, and total costs. Where feasible, bridges, bottomless arches, and pipe arches will be the preferred structure on Class I and II streams. Culverts are to be designed and installed on Class I and II streams to allow fish passage during normal and low flows, and to have minimal downstream scour. Site-specific field reconnaissance has identified general culvert sizes and bridge locations; however, detailed culvert and bridge design is not performed until final road design and layout. Unit allocation to alternatives is indicated in the alternative maps and in Appendix B, Table B1.

ADFG-37

Comment noted. These dates are correctly noted in Chapter 3. Timing windows for instream work on catalogued Class II streams are applied depending on the anticipated effect of instream work on downstream Class I fisheries habitat. The placement of temporary bridges or culvert installation during extremely low flows is not considered instream work.

ADFG-38

ADFG&G provided detailed scoping comments in written form (consisting of 7 pages plus attachments) on October 4, 1991. There was no indication in these comments of any misunderstanding regarding Project boundaries. In addition, two substantive meetings were held between ADF&G staff and ID Team staff to consult on the formulation of the action alternatives and to consult on high value fish and wildlife habitats in the Project Area. These meetings involved detailed review of maps of the Project Area and draft alternatives. Finally, numerous informal conversations have occurred between ID Team and ADF&G staff regarding the project. Therefore, the Forest Service believes that ADF&G has had numerous opportunities to provide scoping comments and that they took advantage of them.

ADFG-39

A map, showing the portion of the Project Area covered by the Primary Sale Area is shown in Figure 1-3. Units within the Primary Sale Area will be offered first to KPC. Areas outside the Primary Sale Area will be offered to KPC under the "additional cutting areas" section of the KPC contract, or will be offered under the Ketchikan Area Independent Timber Sale Program.

Field reconnaissance for cave and karst resources was conducted in all harvest units in the project unit pool. The results of these investigation are discussed in the EIS. As noted in the EIS, significant caves are not disclosed to the public. Consequently, the cave and karst resource is documented in more detail in the Minerals and Geology

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degrees of harvest are proposed within this watershed under the action alternatives for this DEIS, with Alternative 3 proposing the most harvest and Alternative 5 the least. Although we are pleased to see that the DEIS has recognized the important habitat values of this area (4-92), we would request that additional harvesting be deferred during this operating period. Besides its exceptional fish and wildlife values, the Indian Creek watershed continues to serve as a baseline control for anadromous fisheries research conducted by the National Marine Fisheries Service and will soon be used as an unfragmented old-growth study area for a recently initiated research project concerning the ecology of the Alexander Archipelago wolf in fragmented landscapes (D. Person, pers. comm.). In addition to prolonging the habitat values of this area, deferring timber harvest will allow this research to be conducted under controlled circumstances.

- (19) Unit plans and the need to restrict timber harvesting to within the unit boundaries that will be exhibited in the forthcoming ROD.

ADFG-41

Although we are pleased to see unit plans for proposed cutting areas, these plans are not as detailed and comprehensive as the combination of unit cards and specialists reports previously reviewed for past timber sales. We are concerned that as the final lay-out and implementation progresses, changes will be inevitable. This was so common during the last operating period that we were overwhelmed by the extent of changes and were unable to keep track of the expansion of units which occurred as a result of what appeared to be an imprecise ROD adhering to inflexible timber outputs.

On several occasions we requested the opportunity to review the locations and cumulative amount of roading and cutting outside of ROD unit boundaries (see correspondence of 9/23/92, 11/12/92, and 2/3/93), but were unable to obtain this information in a suitable format. Consequently, although our information was incomplete, we thought there may have been greater than 2,000 acres of cutting outside of the ROD unit boundaries. However, we could not determine exactly where these roading changes or unit expansions occurred, or their potential impingement upon other resources of concern. It was recently reported, however, that the IDT leader for the CPW project has, in an affidavit to the Office of Special Counsel, alleged that over 5,000 acres of cutting may have taken place outside of designated harvest boundaries and that many, if not all of these acres, may not have had proper environmental evaluations (Anchorage Daily News, 8/31/93).

We continue to be concerned that the potential for unit expansions exists during the implementation of the Polk Inlet sale. As more field work is accomplished and changes are made in the roading and logging shown on the unit plans, we would like to be able to track those changes and evaluate their effects upon fish and wildlife habitats and cumulative impacts. Consequently, we ask to be kept apprised of changes of ten acres or more to Polk Inlet plans, if and when they occur.

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(cont)

Resource Report for the Polk Inlet Project Area (Stewart and Jackson 1993) which is also referenced in the EIS and is contained in the planning record. As also noted in the EIS, all newly discovered caves are temporarily managed as sensitive caves until an analysis of resource values is completed. Mitigation measures for caves are specifically discussed in the EIS including the requirement for further site-specific investigations and mitigation including detailed cave investigation and evaluation of the subsurface hydrologic connections prior to harvest unit layout. The Ketchikan Area Monitoring Plan is discussed in detail in Chapter 2. Cave and karst monitoring is included in that plan. The above review of material specifically discussed in the EIS clearly indicates that potential threats to caves resources are adequately addressed in the EIS.

Additionally, Forest Service recognition of the importance of karst resources resulted in the contracting of a Karst Resource Panel. Their direction was to determine the significance of karst areas in the Ketchikan Area, to evaluate the effectiveness of current standards and guidelines, and to recommend resource evaluation goals. The Karst Resource Panel's report was released November 23, 1993, after the publication of the Polk Inlet DEIS. Based on the recommendations in that report, the Ketchikan Area Office has developed a vulnerability determination procedure for karst and cave resources. That procedure will be applied to the Polk Inlet Project Area prior to timber sale implementation. These new and on-going procedures have been added to the Geology, Minerals, and Cave sections.

ADFG-40

Note that Alternative F5 does not propose further harvest in the Indian Creek Watershed partially in response to ADF&G input. Further, Alternative F2 has been modified to include less harvest in Indian Creek for the FEIS.

ADFG-41

The Ketchikan Area has developed a policy for evaluating changes to units and roads that occur between the FEIS/ROD and final layout. This policy includes specific conditions that trigger additional review opportunities for ADF&G and others. The policy also addresses when additional NEPA documentation may be required.

It should be noted that 100-percent field verification of units and roads for the Polk Inlet EIS should reduce the extent of post FEIS/ROD changes on previous projects. Unit shapes and road locations were often changed substantially between the planned version and the field-verified version in response to conditions observed on the ground. However, field verification was oriented more to feasibility rather than to the specific locations of unit boundaries and road centerlines. Therefore, further changes are expected. The Ketchikan Area unit and road change policy will track the implementation process and ensure that adequate review and NEPA documentation takes place.



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Additionally, some specific unit cards will eventually need to be examined in greater detail, especially as specialists reports become available and more site-specific information is developed.

(20) The definition of "Forest Land" used by the FS is misleading.

One of the primary concepts emerging from Forest Service EISs which tends to confuse the public in their understanding of forestry issues originates in the way the FS defines "forest land." Most people perceive of "forests" according to the dictionary definition of the term; i.e. "tracts of wooded lands" or "a dense growth of trees and underbrush covering a large tract." In the Forest Service's definition of "forest land," however, these lands may be 90% unforested. It is only when a landscape has less than a 10% cover of forest trees, though, that it is recognized by the Forest Service as "nonforest land" (3-72). Consequently, in using this definition for "forest land" in the figures, charts, tables, and graphs of an EIS, it tends to create the perception that there is a lot more "forest" (and productive wildlife habitats) on the Tongass than actually exists. The FS should attempt to clarify this issue by adjusting their definition of "forest land" to be more consistent with the classic definition and generally accepted perceptions of "forests." Perhaps lands with less than 8,000 bf/ac, but greater than 10% tree coverage should be defined as "scrub" to better describe their dominant structure and appearance. About 64,200 acres of FS lands (38%) within the Polk Inlet Project Area consists of this type of "scrub," which is currently defined as "noncommercial Forest land" by the FS.

(21) Maps.

Alternative maps in the FEIS should show topography, existing productive forest land in the project area, existing roads and clearcuts, proposed roads and cutting units, previously designated retention, the boundaries of Old Tom Creek Research Natural Area, and locations of volume class 4, 5, 6, and 7 stands. They should also show the extent of logging on adjacent private lands so that the action alternatives can be viewed in light of existing impacts to wildlife habitat within the Project Area as a whole. These features should be on the same map so that reviewers can clearly see how the proposed harvest affects the mosaic of forest in the project area.

The small scale and lack of topographic features on the alternative maps in the Polk Inlet DEIS result in these maps being the poorest quality of any we have seen for a major EIS in the Ketchikan area. In addition, place names of many locations referred to in the DEIS narrative are not identified on the maps. A few examples include: Beaver Creek, Indian Creek, Old Franks Creek and Lake, Kina Creek, Sunny Creek, Cabin Creek, Dog Salmon Creek, Rock Creek, Twelvemile Creek, Twentymile Creek, Cannery Creek, Big Creek and nearly all other streams mentioned in Appendix C-3 stream and watershed descriptions, as well as all of the existing and proposed logging camps. Also, the map for Alternative 1 appears to be inaccurate. Despite the legend which

ADFG-42

ADFG-43

The use of 10% tree cover as the minimum criterion for defining forest land is a broadly used convention for vegetation or cover mapping. The entire Tongass GIS database is set up this way and the Forest Plan and TLMP Draft Revision are written using this definition of forest land. Note that the term "old-growth forest" is reserved only for productive forest land or CFL which contains well over 10% coverage. Note also that areas mapped as nonproductive forest land may have > 8,000 bf/acre and may have canopy coverages much higher than 10%. Finally, note that the use of the term "scrub" to describe areas with > 10% tree coverage and < 8,000 bf/acre would be misleading. In his classic plant ecology text, Daubenmire (1968) defines "scrub" as "woody plants < 2 m tall ... growing rather closely spaced (subdivided as forest)."

See response to GRP-17.

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indicates that roads from the 89-94 operating period are depicted, no roads are shown accessing existing clearcuts/second-growth in the Indian Creek drainage, McKenzie Inlet or the northern portion of VCU 613. As a result, these maps are not particularly useful in the review of this EIS. We would like to request that the FEIS provide public review maps which are at the 1"/mile scale and depict the important features noted above. Excellent quality maps were provided in the 1989-94, North Revilla, and CPW FEISs. If inadequate or poor quality maps, like those in the Polk Inlet DEIS, appear in the FEIS, we will request that the review clock be stopped and the review of the FEIS be held in abeyance until better quality public review maps are provided.

(22) Unit Cards.

ADFG-44

The Unit Design Cards for this DEIS do not indicate what alternatives each unit is considered for. Rather, they require constant reference back to the alternative maps for this information. The Unit Design Cards for the FEIS should clearly indicate which alternatives each unit applies to. This was done for the CPW and North Revilla FEISs and proved to be an effective format for efficiently reviewing the cards.

**ANILCA 810 ANALYSIS**

ADFG-45

The Division of Subsistence staff has had good interactions with the subcontractor on this EIS and are pleased that much of the existing subsistence data was integrated into the analysis and that new research on subsistence patterns was conducted in the affected communities (Langdon, et al 1992). However, these data show that under all the action alternatives, three of the five affected communities (Craig, Hollis, and Hydaburg) may have significant restrictions on subsistence use of deer, black bear, and marten in the coming decades. A forest-wide cumulative effects analysis suggests that all the affected communities will experience significant restrictions to subsistence by the year 2040. These grim findings raise questions as to whether subsistence impacts are being given due consideration in the planning process. The following comments address these and other specific issues concerning the DEIS.

ADFG-46

**Selection of Polk Inlet as a Project Area**  
The selection and scheduling of this project do not appear to have been influenced by subsistence considerations. The rationale provided in Appendix A describing the purpose and need for the project is not convincing. It is stated that all LUD III and LUD IV areas would need to be logged in order to fulfill KPC contract obligations, thus "indicating a level of impact to all subsistence use areas" (p. A-13). If this is the case, then a "triage" approach is necessary to determine where harvest can take place with the least overall impacts to subsistence needs. But such an analysis does not appear. Instead, the appendix rather cynically concludes that because subsistence impacts are inevitable wherever cutting takes place, it is not necessary to consider subsistence in deciding where to harvest or in scheduling sales (p. A-12, paragraph 1). Such reasoning only

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ADFG-44

A convenient listing of which units are included in each alternative is presented in Appendix B, Table B1, Summary of Harvest Unit Characteristics. This table eliminates the need to page through all the alternative maps.

Comment noted.

ADFG-45

ADFG-46

Appendix A describes the reasons for scheduling timber harvest within the Polk Inlet Project Area at this time. Subsistence was one of several considerations included in the scheduling process. As noted, Appendix A concludes that to meet long-term sale volume commitments, almost all Management Areas containing LUD III and IV lands would have timber harvest entry by 2004.

Chapter 2 of the EIS describes that subsistence was one of the major issues considered in the development of the alternatives. In addition, Chapters 3 and 4 demonstrate that effects on subsistence were given major emphasis in terms of baseline data collection, effects analysis, and mitigation plan development.



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serves to rationalize away subsistence considerations. If minimizing effects on subsistence were a planning goal, then Polk Inlet would not be scheduled for logging as long as other areas are available for logging where subsistence impact might be less.

### Narrow range of alternatives

The range of timber harvest levels among the action alternatives is exceedingly narrow. The action alternatives call for harvests between 124-127 MWBF. Given the significant impacts on subsistence from this and other sales on Prince of Wales Island, we hope that serious consideration will be given to a lower volume harvest which is more sensitive to subsistence needs as indicated by existing data and upcoming 810 hearing testimony. None of the action alternatives consistently avoids significant subsistence harvest and habitat areas as identified by the Tongass Resource Use Cooperative Survey mapping and other sources.

### Display of TRUCS mapped data in Figures 3-24 through 3-28

No convincing rationale is provided for displaying only those areas where more than 10 percent of the affected communities have hunted. Choosing this cut-off implies that areas used by less than 10 percent of the population are not important subsistence areas. This is erroneous. First, even 1 percent of households in a large rural community like Craig constitutes a significant number of hunters. Second, in many rural communities hunting is dispersed, such that the percent of households using any single area often does not exceed 10 percent. Third, subsistence research has shown that a relatively small percentage of households in a community typically harvest large portions of the resources (and then distribute them to other households). Thus, the fact that a small percentage of households are using an area does not preclude the possibility that a large number of the community's deer are coming from that area. For these reasons, the 10 percent cut-off is not tenable. We would support a cut-off of no more than 1 percent of households for these maps.

It would also be useful if the maps displayed differences in intensity of use as the TRUCS maps do. With only extensity data displayed, the utility of the maps is much more limited. These maps should also be properly cited as to their source (TRUCS 1988).

### New Subsistence Data

We are pleased to see that new subsistence data were gathered through interviews with more than 50 households in the affected communities (Iangdon, et al. 1992). We found the presentation of the results to be somewhat confusing, however. Table 3-58 omits many comparative values from TRUCS which are available. The Overview on pages 3-152 and 3-153 is rather mechanical and framed in raw numbers of households rather than in more meaningful percentages. Also, the findings are not linked at all to the proposed actions. Did this research have any tangible effect on the framing of alternatives? If so, the FEIS should explain how.

ADFG-46  
(cont.)

ADFG-47

ADFG-48

ADFG-49

ADFG-47

ADFG-48

ADFG-49

Refer to response to ADFG-3. The alternatives analyzed in detail in the EIS are quite different in terms of their spatial arrangements of units and roads. They are also quite different in terms of their local effects on subsistence. Subsistence was one of the major issues considered in the development of alternatives (see Development of Alternatives in Chapter 2).

The presentation of maps showing areas where more than 10% of community households hunted was intended to show areas of concentrated use and high importance. The areas used by more than 1% percent of the households are very common and widespread.

The subsistence interviews do not represent a statistically designed survey and so should not be compared directly with TRUCS data. The purpose of the interviews was to provide supplementary information and, in general, the interview results served to confirm the patterns identified in TRUCS.

Presentation of results in the FEIS was refined for the purpose of improving clarity.

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A table would be useful here showing proposed harvest units and the level of subsistence activity that takes place in these units according to TRUS data and the 1992 research. Without this context, the public will have great difficulty interpreting this information.

ADFG-50

"Avoidance" of High Use Subsistence Areas  
As in other EISs, this DEIS makes much of the fact that "high use" subsistence areas, such as beach fringe, are generally not affected by the proposed alternatives (e.g., p. 4-173). We continue to object to this facile statement. It is wrong to equate general avoidance of logging on certain environments (beach fringe, estuary fringe, and riparian areas), many of which are excluded from logging by law, with protection of the "highest value subsistence use areas." While it is true that subsistence harvesting takes place in coastal beach fringe, riparian, and marine environments, sufficient habitat for wildlife populations used for subsistence must be maintained to avoid significant restrictions to subsistence harvesting. Thus, clearcutting large tracts of uplands above a high use beach fringe hunting area hardly constitutes "protection" of that environment for subsistence use.

ADFG-51

### Cultural resources

Subsistence camps and other non-renewable aspects of traditional use patterns should be considered in the Cultural Resources Section. Maps showing traditional use areas (from Goldschmidt and Haas (1946) or other sources) should also be included in the analysis. Measures to avoid impacts to important traditional subsistence areas need to be spelled out. In addition, the term ethnohistory should be defined under Key Terms.

ADFG-52

Mitigation and monitoring of impacts on subsistence  
Although Chapter 2 of the DEIS includes an elaborate model for monitoring (Fig. 2-5), we found no evidence of a monitoring plan for subsistence. The FEIS should incorporate a monitoring plan for subsistence with the "Objective" being to more precisely assess and mitigate impacts of timber harvest on subsistence harvests; the "Desired Result" being no adverse impacts on subsistence harvesters; the "Effectiveness Monitoring" to include a report analyzing use of the area, levels of harvest by community, etc.; and the "Validation Monitoring" to include a determination of whether the conclusions found in the EIS regarding the abundance, distribution, access, and competition are correct. Without such monitoring, we do not see how impacts to subsistence can be evaluated once the timber harvesting begins. Given the uncertainty expressed in the FEIS about the level of subsistence use in the area, and the potential need to limit non-rural hunters, subsistence monitoring should be a high priority.

ADFG-53

We found little evidence of mitigation measures for subsistence in the FEIS. The summary (p.34) reiterates a faulty assumption which, unfortunately, is too often found in EISs, namely that

## Responses to the Alaska Department of Fish and Game - Jack Gustafson

ADFG-50

We disagree. In analyzing the effects on subsistence it is necessary to consider both the effects on subsistence use areas and the effects on wildlife populations or habitats. The majority of the subsistence section addresses the effects on populations of wildlife used for subsistence. The section on wildlife analyzes these effects and addresses mitigation in detail.

ADFG-51

General subsistence data from traditional use patterns for Goldschmidt and Haas (1946) was utilized in the preparation of both the Cultural Resources Baseline Study and the DEIS. The DEIS does not show map locations of subsistence camps or structures as the further publication of these ethnohistoric and archaeological sites might put them at greater risk. These places are now afforded the same privacy as other cultural resource locations.

ADFG-52

The subsistence areas are general, especially concerning upland hunting. However, the camps and habitations associated with traditional subsistence all fall within the 500-ft. shoreline buffer zone. Thus, direct impacts to these places are not expected.

ADFG-53

The monitoring of subsistence harvests is a Forest Plan-level issue and is beyond the scope of this project-level EIS. However, the level of harvest data already collected by ADF&G throughout southeast Alaska, is not likely to justify an additional harvest data collection effort.

ADFG-53

The mitigation of effects on subsistence have been incorporated in the EIS alternatives in a number of ways: (1) mitigation through avoidance of geographic areas; (2) site-specific measures to mitigate fish and wildlife impacts; and (3) road closures and other access management to mitigate competition for subsistence resources. These mitigation measures are described in Chapter 2. See the response to ADFG-17 regarding the portion of the comment on camp personnel.

## Comments of the Alaska Department of Fish and Game - Jack Gustafson

Lorraine Marshall

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ADFG-53  
(cont.)

"Because most subsistence use involves harvesting fish and game, mitigation measures that protect or enhance fish and game resources will also protect and enhance subsistence activities." If we follow this logic to the extreme, one might posit that a complete ban on hunting and fishing would somehow be good for subsistence. It is wrong to assume that mitigation measures that protect or enhance fish and game resources will automatically protect and enhance subsistence activities, especially when access, competition, and logging of traditional subsistence use areas will all increase as a direct result of the proposed action.

Mitigation of potential competition for subsistence resources by temporary communities should include a strict ethics policy, as discussed previously, which prohibits Forest Service and logging camp personnel from using government or company equipment to access or harvest fish and wildlife resources on the Tongass.

In addition, the placement, construction, and management of roads should be based upon their potential impacts to subsistence. Our research show that roads bring competition and may lead to restrictive regulations, thus negatively impacting subsistence productivity. Mitigation and monitoring measures to minimize adverse impacts of roads on subsistence need to be spelled out in the FEIS.

ADFG-54

### Logging camp impacts on competition

Logging camps are communities introduced into remote areas through Forest Service planning and need to be considered both as "impacts" and "subsistence communities." The Polk Inlet project will support existing logging camps in the area and, under alternatives 3 and 4 potentially introduce a new community to the project area. Six logging camps (Polk Inlet, Natzuhini, Skowl Arm, Saltery Cove, Cholmondeley, and Dolomi) have used the area in recent years for hunting or fishing. Their impacts on resource abundance, distribution, access, and competition may be significant. It is difficult to assess the impacts of logging camps, however, because we have little or no data on their harvests. The DEIS reports that interviews were conducted in Natzuhini and Polk Inlet regarding harvest levels and use areas. However, the results of these interviews on harvest levels are not clearly presented in the discussion in Chapter 3. Unfortunately, ADF&G mail-out survey results (especially 5 year harvest averages) for remote logging camps are probably not reliable because of low response rates and the peculiar demographic conditions that exist in these fluctuating communities. This is another reason why better monitoring (see comments above) of these communities is needed.

The projected impacts of these communities need to be considered in detail in the FEIS. The issue is not discussed in Chapter 4. Using the data that was collected by Langdon, et al, (1992), we suggest that the potential impacts of the logging communities on subsistence can be reasonably estimated in the following way: 1)

## Responses to the Alaska Department of Fish and Game - Jack Gustafson

ADFG-54

Your comments have been considered. The effects on subsistence activities of logging camps have been strengthened in the FEIS.



## Comments of the Alaska Department of Fish and Game - Jack Gustafson

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ADFG-54  
(cont.)

ascertain what level of deer harvest occurs presently in Polk Inlet and other camps; 2) predict impacts on individual WAAs by analyzing past spatial hunting impacts of logging communities in the area; and 3) estimate future harvest levels based on 1 & 2 and adjust these levels according to projected population levels in the proposed camps in each phase of the project. We would be happy to work with the contractor to complete this analysis for logging camps using the Polk Inlet area.

ADFG-55

Cumulative effects forest wide, WAA maps  
The discussion of cumulative impacts on subsistence is weak. Although the project area is limited, Prince of Wales Island communities are also being affected by other FS timber sales nearby (e.g., CPOM, Lab Bay, Control Lake) and elsewhere in the Tongass. We recommend displaying cumulative effects not only at the project area level, but also at the regional subsistence and forest-wide levels. At the regional subsistence level, this means showing effects from logging which will occur in the areas where the affected communities obtain 90 percent of those resources determined to be impacted by logging (for the Polk Inlet EIS this would probably include the greater portion of Prince of Wales Island). Examples of this kind of analysis in tabular form can be found in the CPOM and North Revilla EISS. To show forest-wide effects, we recommend including GIS mapped analyses (see SE Chichagof FEIS, Appendix E, North Revilla FEIS, Appendix J) of deer supply (10% habitat capability) vs. demand (present and future harvest) for all Tongass WAAs; we have already provided copies of these and other relevant maps to the Forest Service. This kind of spatial analysis is critical for the public to evaluate overall impacts on subsistence.

ADFG-56

Section 810 Determinations  
810 determinations need to be clearly represented by community, WAA, project-specific, and cumulative effects. We recommend including a set of four summary tables which display both site-specific and cumulative effects by community and WAA. These tables should be organized as follows:

- a. Significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer from project activities for project area by community and alternative.
- b. Significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer from project activities (preferred alternative) by WAA and by community.
- c. Significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer from project (preferred alternative) and other forest management for project area by community.
- d. Significant possibility of a significant restriction of subsistence use of Sitka black-tailed deer from project (preferred alternative) and other forest management by WAA and by community.

## Responses to the Alaska Department of Fish and Game - Jack Gustafson

ADF-55      The section on cumulative impacts on subsistence has been revised in the FEIS to incorporate all lands within each WAA, including State and private lands.

ADF-56      These comments have been considered in the refinements made to this section in the FEIS.

Comments of the Alaska Department of  
Fish and Game - Jack Gustafson

Lorraine Marshall 26 November 12, 1993

We are pleased to see tables summarizing 810 findings for other species beside deer. However, as with the deer data, project-specific versus cumulative, forest-wide effects on subsistence use of these species need to be differentiated.

Other Comments

The comparison of 1992 surveys with TRUCS data in tabular form such as that presented in Table 3-58 (p. 3-151) is useful, but the task is incomplete. A number of figures from TRUCS are missing or collapsed. Comparable figures on percentage of households harvesting the listed resources are available from TRUCS for the year 1987. We would be happy to provide these figures.

Miscellaneous

Kirchhoff (1991) is misspelled on page 4-82 and is not included in the literature cited section. In addition, Thornton is misspelled as Thorton throughout the document.

Thank you for the opportunity to comment.

- cc: L. Shea, ADF&G, Juneau  
T. Paul, ADF&G, Juneau  
T. Thornton, ADF&G, Juneau  
J. Ferguson, ADEC, Juneau  
J. McAllister, ADNR, Juneau  
N. Holmberg, USFWS, Juneau  
D. Peterson, NMFS, Juneau  
S. Cantor, EPA, Anchorage  
D. Rittenhouse, USFS, Ketchikan  
T. Stewart, Ebasco, Bellevue, WA


Responses to the Alaska Department of  
Fish and Game - Jack Gustafson

- ADFG-56 (cont.) ADFG-57 Please examine the table you refer to more closely. You will find that the 1987 TRUCS percentages you refer to are in fact, already in the table.
- ADFG-58 Comment noted. The text has been corrected.

Comments of the Alaska Department of  
Fish and Game - Tom Paul

**MEMORANDUM**                      **State of Alaska**

To: Lorraine Marshall  
Project Coordinator  
Division of Governmental  
Coordination  
Juneau

From: Tom Paul   
Wildlife Technician/Planner  
ADFG/DWC Douglas

Date: 29 Nov. 1993

Telephone: 465-4358

File No: AK9310-05JJ

Subject: Additional  
Comments on  
Polk Inlet  
DEIS

ADFG-59

Responses to the Alaska Department of  
Fish and Game - Tom Paul

The design of one plot per 10 acres is not considered adequate to accurately represent the volume of each unit. The design was intended to provide accurate volume estimates on an alternative-basis not a unit-basis. For example, the volumes for more than one-third of the units you refer to are based on only one or two plots because the units are in the 15- to 25-acre range. Also refer to responses to ADFG-6 and ADFG-60.

ADFG-59

We recently acquired timber field exam data from Mason, Bruce, and Girard, Inc., the timber subcontractor for the Polk Inlet EIS. Examination of this data raises new and increased concerns about the disproportionate harvest of high volume timber that is proposed for this sale. Although the deadline for comment on the DEIS is past, we hope you will transmit this officially to the Forest Service so that they are aware of our concerns before proceeding farther into FEIS preparation.

The field exam data reinforces our ongoing concern about the accuracy of TIMTYP maps for calculating proportionality to measure compliance with the Tongass Timber Reform Act. In the past, field exams done for timber sale EISEs (Kelp Bay, SE Chichagof), verified that the acreage of high volume in the proposed harvest units was notably different from that claimed by the TIMTYP database. Field data from Polk Inlet also confirms that pattern.

According to the EIS Forestry Team Leader, Jim Mehrwein, the timber field exams sampled one plot every 10 acres on average in each proposed harvest unit. The data we received included acres, species composition of stands, gross volume, net volume, utility volume, and net+utility volume in Bureau scale (32-foot log scale). We converted the volumes to inventory scale (16-foot log scale) so that the field exam data could be directly compared with the TIMTYP maps which show volume class in inventory scale. Mehrwein said at this date the data have been reviewed and substantially finalized, although some limited revisions may be made.

Comparing inventory volumes from the field data to TIMTYP mapped inventory volume shown on maps in the Draft EIS, we found that 26 high volume harvest units (averaging more than 30 mbf/acre) were mapped as low volume stands in the DEIS, whereas 6 low volume harvest units (averaging less than 30 mbf/ac.) were mapped as high volume stands. (See attached list of high volume stands.)

The net increase in the number of acres of high volume stands that are proposed to be harvested is substantial. In MA K18, 19



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ADFG-59  
(cont.)

high volume units and 5 low volume units were mistyped in the DEIS. The net increase in the number of high volume acres to be harvested is 43% to 105% higher (depending on alternative) than predicted in the DEIS. Seven units typed as low volume in MA K18 by the DEIS are actually rare volume class 7 stands averaging over 50 mbf/ac. according to the field data. One unit, 613-234, averaged 88 mbf/ac. Altogether in MA K18, a net of 28 million board feet of inventory high volume timber is not being counted as high volume by the DEIS for the purposes of complying with TTRA.

In Management Area K17, 7 high volume units and one low volume unit were mistyped in the DEIS. The net increase in the number of high volume acres to be harvested is 100% to 400% higher (depending on alternative) than predicted in the DEIS. One unit typed as low volume in MA K17 is volume class 7 according to the field data. In MA K17, a net of almost 10 million board feet of inventory high volume timber is not being counted as high volume by the DEIS for the purposes of complying with TTRA.

ADFG-60

If these additional acres of high volume harvest are added into the DEIS table 4-30, disproportionate harvest of high volume acres increases. For all action alternatives in both management areas, disproportionate harvest of high volume exceeds the Forest Service's own guideline for allowable disproportionate harvest of 0.5% less than TTRA baseline. In MA K17, proportionality for alternatives 2 through 5 is more than 1.25% less than the TTRA baseline. In MA K18, proportionality for alts. 4 and 5 is more than 1% less than the TTRA baseline.

ADFG-61

In every previous EIS since the passage of TTRA the State has raised the issue of the accuracy of TIMYP maps for determining proportionality and argued that field exam data is more accurate (see DGC comments on Kelp Bay, Southeast Chichagof, North and East Kulu, North Revilla, Central POW, and Ushk Bay Eises). Although DGC has repeatedly requested a meeting with the Forest Service to discuss and clarify this issue, there has been none. The accuracy of the TIMYP data not only bears on the proportionality issue but also on the accuracy of the wildlife information in the DEIS. It too is based on the TIMYP database. The field exam data suggests there will be a greater loss of high value wildlife habitat than depicted in the DEIS.

The Forest Service needs to change its alternatives in Polk Inlet to reflect the more accurate field exam data and prevent the apparent disproportionate harvest of high volume timber and high value wildlife habitat.

Thank you for the opportunity to comment.

cc: Kim Titus, DWC  
Jack Gustafson, DH&R

Responses to the Alaska Department of  
Fish and Game - Tom Paul

ADFG-60

Refer to responses to ADFG-6 and ADFG-9. The ID Team developed a Logging System and Transportation Plan for all suitable and available CFL and then selected harvest units for the Project Unit Pool without any knowledge of volume class, let alone the actual volumes in the units. The observation that there may be higher volumes than the TIMYP map indicates within harvest units suggests that all suitable-available CFL may be this way and that the TTRA baseline for proportionality may need to be revised.

ADFG-61

Refer to response to ADFG-6 and ADFG-60.

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Polk Inlet harvest units mapped entirely as low volume in DEIS but found to be high volume ( $\geq 30$  mbf/ac.) through field exams.

VCLU-unit	Net Sawlog Bureau scale (mbf)	Net Sawlog inv. scale (mbf)	Acres	Net vol./acre (Inventory) (mbf/acre)	Alternative <sup>1</sup>
<b>Management Area K-18</b>					
612-202	1,003	1,304	21	62	3,4
612-207	2,390	3,107	80	52	3,4
612-211	529	687	20	34	3
613-210	964	1,253	41	31	2,3,5
613-222	1,796	2,335	57	41	2,3,4,5
613-234	2,753	3,579	41	88	2,3,5
613-282	453	589	14	42	2,4,5
613-283	412	538	18	34	2,4,5
618-203*	832	1,211	20	61	5
618-205*	2,035	2,648	38	69	5
618-221	1,216	1,581	27	60	5
619-215	2,178	2,831	55	52	2,4,5
820-202	851	1,108	32	35	2,3,4,5
820-231	1,364	1,773	45	39	2,3,4,5
820-295	1,984	2,579	54	48	2,4,5
820-307	459	598	14	43	2,4,5
820-316	878	1,141	37	31	2,5
820-343	1,162	1,537	39	39	2,4,5
820-360	1,085	1,385	41	34	2,3,4,5
<b>Management Area K-17</b>					
621-254	534	694	20	35	3,4
621-264	1,387	1,803	55	33	2,3,4,5
621-308	1,278	1,661	40	42	3
622-249	1,009	1,311	24	55	2,3
822-271	940	1,222	31	39	2,3,4
824-207	2,644	3,697	90	41	2,3,4,5
824-230	1,684	2,189	59	37	2,3,4,5

<sup>1</sup> Proposed cutting alternatives in which the timber harvest unit appears.

\* Uneven aged management stands. Not all timber in the stands will be cut. Figures represent total volume of the stand and were derived by adding 20% to the volume planned to be cut as suggested by J. Mehrwein, Forest Team Leader.

Comments of the Alaska Department of  
Environmental Conservation - Jim Ferguson

Responses to the Alaska Department of  
Environmental Conservation - Jim Ferguson

**MEMORANDUM**

**STATE OF ALASKA**

Department of Environmental Conservation

ADEC-1

Recent slide activity has occurred within the Fubar Creek drainage associated with the October 1993 storm system. Because of the potential sediment influx associated with this renewed slide activity, and the fact that Fubar Creek is on the Clean Water Act 303(d) impaired waters list, harvest activity will be deferred in the Fubar Creek drainage during this entry.

TO: Lorraine Marshall  
Project Review Coordinator  
OMB-DGC

DATE: November 15, 1993

FILE NO: AK9310-05JJ

THRU:

TELEPHONE NO: 465-5365

SUBJECT: Polk Inlet DEIS

FROM: Jim Ferguson *JMF*  
Program Coordinator, Forest Practices  
Southeast Regional Office

The Department of Environmental Conservation has reviewed the DEIS for the Polk Inlet Long-Term Timber Sale (LPK). This sale proposes to harvest between 124 and 127 MMBF of timber on 4044 to 4838 acres. Proposed road construction and reconstruction ranges from 44 to 58 miles. Proposed new LTF's will be reviewed separately under the ACMP.

ADEC's comments are intended to assist the U.S. Forest Service (USFS) in the preparation of a Final EIS that will be consistent with the Alaska Coastal Management Program (ACMP) and Section 319 of the Clean Water Act (Section 319). The latter comments are offered under the authority of Section 319(b)(2)(F) and 319(k), which give States the authority to review Federal projects for consistency with State nonpoint source pollution management plans. The State of Alaska's plan is the Nonpoint Source Pollution Control Strategy (Strategy). Further, ADEC will be working with the Forest Service under the terms of the USFS/ADEC Memorandum of Agreement, which describes in detail how the State and the Forest Service will implement the Strategy.

**PRELIMINARY ACMP CONSISTENCY COMMENTS**

ADEC-1

1. Fubar Creek: ADEC's 1992 report on Section 305(b) of the Clean Water Act includes Fubar Creek, which is 303(d) listed (impaired). Therefore, this stream qualifies for a Total Maximum Daily Load (TMDL) assessment. All proposed action alternatives propose harvest in the Fubar Creek watershed. ADEC opposes allowing further road building and/or timber harvest in this watershed unless and until the results of a TMDL or other comprehensive watershed assessment indicate that no further degradation of water quality would result.



## Comments of the Alaska Department of Environmental Conservation - Jim Ferguson

## Responses to the Alaska Department of Environmental Conservation - Jim Ferguson

ADEC-2	Lorraine Marshall	2	November 15, 1993	<p>2. Indian Creek: This watershed has served as a control for a number of stream and watershed studies on Prince of Wales Island. It is proposed as a control for the ADEC/University of Alaska rapid bioassessment study as well. ADEC asks that the Forest Service defer or exclude timber harvest from the Indian Creek watershed to preserve its value as a research and monitoring stream system.</p>	<p>ADEC-2</p> <p>Refer to response to RM-8.</p>
ADEC-3				<p>3. Unit Cards: Overall, ADEC was pleased to see the level of detail presented in the unit cards. We particularly appreciate the inclusion of Table B2, which greatly facilitated unit card review. ADEC has not had the time to carefully review each unit card. However, we have examined the cards where stream protection BMPs were prescribed, and where harvest is proposed in watersheds that have experienced a high level of past harvest. We offer the following specific comments:</p> <p>A. Unit 622-208: ADEC opposes harvesting this unit, as well as units 622-203 and 622-212, as discussed in section 1 above. We are also concerned about units 622-201 and 622-205, which are in the upper Harris watershed, and which are very close to the Fubar Creek drainage. Specifically on the unit 622-208 narrative, however, we are concerned that the soils specialist, noting concerns over steep slopes, slides, and windthrow, recommended helicopter yarding, but that highlead yarding was prescribed. What reasoning lead to this decision, and are there other units where similar decisions were made?</p> <p>B. Unit 611-201: The unit prescription states, in part, "A second stream flows east-west, directionally fall trees away from this stream and split yard if possible (BMP 13.16), however, it is not required because it flows into a Class III stream." ADEC is very concerned about such recommendations for two reasons:</p> <p>(1). It is impossible to translate such a recommendation into contract clause language.</p> <p>(2). If the stream is classified, and protection measures under BMP 13.16 (or contract clause B6.5) are appropriate, then the fact that the stream flows into a Class III stream is not sufficient reason to state that protection measures are not required. The primary criteria for the prescription of stream protection measures are sideslope stability, gradient, and incision depth. Substrate may also be a factor. Downstream stream classifications are also a factor, but not the primary factor in choosing the appropriate level of stream protection.</p> <p>C. Two general comments on unit cards are: 1) Windfirmness of unit boundaries and buffers did not appear to be directly considered in unit design: ADEC would like to see documentation of such consideration in the FEIS, and 2) BMP numbers may need to be changed before the FEIS is issued, to reflect the 1993 revision to the Soil and Water Conservation Handbook.</p>	<p>ADEC-3</p> <p>Comment noted.</p> <p>Refer to response to ADFG-5. Additionally, for unit 622-208 the IDT recommendation indicates the necessity of using suspension on any unstable areas. Final layout will also evaluate these factors. Final layout can exclude areas, change the type of cable yarding system to increase suspension, or call for helicopter yarding. In regards to the Fubar Creek drainage, refer to response to ADEC-1.</p>
ADEC-4				<p>ADEC-5</p> <p>Refer to response to ADFG-5. The field observations on the unit cards are summaries of observations made on a variety of field forms. Field observations were reviewed by the Interdisciplinary Team and final unit design recommendations were made by the IDT, with consultation of the original field personnel when appropriate. The original field observations are left on the unit cards so that the process whereby field observations are distilled into IDT recommendations are more apparent. These field observations, the original field forms, and IDT recommendations, will also guide the final layout crews who will have an opportunity to apply further protective measures based on additional field observations.</p> <p>The observation of split yarding being recommended, but not required, is in the field review comments. After office review, the Interdisciplinary Team Recommendation is to implement split yarding on that stream. This IDT recommendation is also carried forward in the silvicultural prescription for this unit.</p>	<p>ADEC-4</p> <p>Refer to response to ADFG-5. Additionally, for unit 622-208 the IDT recommendation indicates the necessity of using suspension on any unstable areas. Final layout will also evaluate these factors. Final layout can exclude areas, change the type of cable yarding system to increase suspension, or call for helicopter yarding. In regards to the Fubar Creek drainage, refer to response to ADEC-1.</p>
ADEC-5				<p>ADEC-6</p> <p>Windthrow is discussed in the EIS in the Windthrow section of the chapter 3 Vegetation and Timber Resources section and in the Mitigation section of the chapter 4 Water, Fish, and Fisheries section.</p>	<p>ADEC-6</p> <p>Windthrow is discussed in the EIS in the Windthrow section of the chapter 3 Vegetation and Timber Resources section and in the Mitigation section of the chapter 4 Water, Fish, and Fisheries section.</p>
ADEC-6				<p>ADEC-7</p> <p>BMP numbers in the 1993 revision are the same as those used on the unit cards.</p>	<p>ADEC-7</p> <p>BMP numbers in the 1993 revision are the same as those used on the unit cards.</p>

## Comments of the Alaska Department of Environmental Conservation - Jim Ferguson

Lorraine Marshall

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November 15, 1993

### PRELIMINARY SECTION 319 CONSISTENCY COMMENTS

1. BMP and Water Quality Monitoring: As written, the Polk Inlet proposed monitoring plan is completely inadequate. The chart on page 2-40 is a good summary of the Clean Water Act/EPA approach to the conduct of BMP monitoring. However, there is no discussion of specific plans to monitor the implementation and effectiveness of BMPs on the project area. A draft monitoring plan was received by ADEC as part of the review of the Central Prince of Wales Timber Sale. This plan proposes to cover all of the timber sales proposed under the long-term sale contract. ADEC assumes that the final version of the draft monitoring plan for the Ketchikan Area will include the Polk Inlet project. However, a final version of the plan will need to be presented in order for ADEC to find the project consistent with Section 319 of the Clean Water Act.

ADEC-8

2. Cumulative Effects Analysis: Timber harvesting and road construction are proposed in three watersheds that have experienced considerable levels of harvest in the past. The Twelvemile, and Cable Creek systems have been heavily logged over the past 35 years. The Fubar/Harris system was discussed earlier. While the amount of harvest proposed in these systems is small, it would seem appropriate to carefully analyze the current condition of these watersheds before proposing additional harvest at any level. In addition, the threshold of concern for levels of harvest in watersheds varies between watersheds: it is not appropriate to use the same threshold percentage for each watershed. Watershed sensitivity models are available within the Forest Service, on the Tongass National Forest, that allow watershed-specific threshold levels to be calculated. Such a model should be used for the Polk Inlet project area.

ADEC-9

Also, this project area has a very large amount of high MMI soils, relative to other projects ADEC has seen over the past three years. On a percentage basis, for the different alternatives, high MMI soils make up from 30 to 44 percent of the total area proposed for harvest. The DEIS does not adequately estimate the potential for sediment delivery to streams due to harvest on steep, unstable, high MMI slopes. The analysis is appropriate at two levels: 1) in determining the total amount of harvest to be allowed in the watershed (a component of the analysis discussed in the preceding paragraph), and 2) at the individual unit and road card level, where site-specific information is considered.

ADEC-10

We appreciate the opportunity to comment.

cc: Ron Flinn, ADEC, Juneau  
Eric Decker, ADEC, Juneau  
Jim McAllister, ADNR, Juneau  
Lana Shea, ADF&G, Juneau  
Jack Gustafson, ADF&G, Ketchikan  
Dave Rittenhouse, USFS, Ketchikan  
✓ Dave Arrasmith, USFS, Ketchikan

Wayne Elson, USEPA, Seattle  
Susan Cantor, USEPA, Anchorage

## Responses to the Alaska Department of Environmental Conservation - Jim Ferguson

ADEC-8

As noted in the EIS discussion of the monitoring plan, implementation, effectiveness, and validation monitoring are done at a Forest Plan level, not for individual projects. As part of Forest Plan monitoring, separate monitoring plans have been implemented for each Administrative Area of the Tongass National Forest. The Polk Inlet Project Area falls within the purview of the Ketchikan Area Monitoring Plan. As stated in the EIS, project-specific monitoring will only occur for individual unique facets of the Project Area.

ADEC-9

Refer to response to ADFG-33.

ADEC-10

Refer to response to ADFG-5 and 33. Additionally, sediment delivery potential is considered in Table 4-12 and the associated discussion. Site-specific BMP's were recommended for each unit and road segment based on all field observations. BMP's are often suggested to minimize the potential for sediment delivery. Steep slopes and high MMI soils were part of this consideration in all cases.

Comments of the Alaska Department of  
Governmental Coordination - Lorraine Marshall



**OFFICE OF THE GOVERNOR**  
**OFFICE OF MANAGEMENT AND BUDGET**  
**DIVISION OF GOVERNMENTAL COORDINATION**

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December 28, 1993

Mr. Dave Arrasmith  
Planning Staff Officer  
Ketchikan Administrative Area  
U.S. Forest Service  
Federal Building  
Ketchikan, AK 99901

Dear Mr. Arrasmith:

SUBJECT: POLK INLET TIMBER SALE DEIS  
STATE ID NO. AK9310-05JJ

ADGC-1

This is to report on the status of this division's response to the Polk Inlet timber sale DEIS. As you know, my time during November had been consumed with Central Prince of Wales timber sale. Since CPOW, I have completed the DGC letter for the Shamrock timber sale, and am now in the process of developing the State's consistency finding for the Bohemia timber sale FEIS. As soon as I complete Bohemia, I will turn to Polk. I know you recognize that I, as well as other resource agencies, am also responsible for other diverse projects and duties, which have waned during this inundation with timber sale reviews in the recent months. I see from our phone log in the file that Karen Essary of my office confirmed with you on December 2 that you received the State agency comments. Karen's note in the phone log states: "comments will be included in public comment." I am assuming and hoping this means they will be included in and responded to in the comment section of the FEIS. I thank you for your patience, and expect to work on Polk next week.

Sincerely,

Lorraine Marshall  
Project Review Coordinator  
SE Consistency Review Section

cc: Jim Ferguson, DEC  
Jack Gustafson, DFG  
Tom Paul, DFG/DWC

polk.ext

Responses to the Alaska Department of  
Governmental Coordination - Lorraine Marshall

WALTER J. HICKEL, GOVERNOR

Comment noted. We have reviewed and are addressing all comments received.

ADGC-1



Comments of the Alaska Department of  
Governmental Coordination - Roger Snippen

ADGC-2

Responses to the Alaska Department of  
Governmental Coordination - Roger Snippen

Comment noted.

# STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

## OFFICE OF THE GOVERNOR

### OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

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January 14, 1994

Mr. Dave Arrasmith  
Planning Staff Officer  
Ketchikan Administrative Area  
U.S. Forest Service  
Federal Building  
Ketchikan, AK 99901


Dear Mr. Arrasmith:

ADGC-2

As you know, State resource agencies have commented on the Polk Inlet DEIS, and those comments were forwarded to you some weeks ago for your consideration in developing the FEIS. We understand that those individual State agency comments would be responded to in the FEIS document as public comments. We regret that the comment from the Division of Governmental Coordination, which represents a consolidated State comment on behalf of the resource agencies, has not yet been finalized.

This is to inform you that the project has been transferred to me for written response. I have recently joined the staff of DGC as a project analyst. I expect to have a response prepared in the near future. I apologize for any inconvenience this may cause you.

Sincerely,

  
Roger D. Snippen  
Project Analyst

FILE FIDEIS

October 21, 1993

TO: Lorraine Marshall  
OMB/DGC

FROM: Bruce Johnson  
DNR/DL/SERO

RE: Polk Inlet DEIS  
AK9310-05JJ

ADNR-1  
Comment noted. Appropriate portions of this information have been included in the FEIS.

ADNR-2  
Comment noted. The FEIS text and the road cards have been modified to reflect this information.

Due to the nature and extent of this document I will limit my comments to those activities requiring actions by this division. These actions consist of authorizations for the LTF's and the crossing of state owned land by the extension of the Indian River road under Alternative 2, 3 & 4.

ADNR-1  
The Forest Service proposes to use LTF's in Twelve Mile Arm, Polk Inlet, McKenzie Inlet (2), Coal Bay, Sunny Point and Cannery Creek. The LTF site in Twelve Mile Arm and the two sites in McKenzie Inlet have tideland lease applications on file and are currently authorized under early entry permits to the Forest Service pending completion of survey requirements allowing issuance of the leases. The LTF site in Polk Inlet consists of three parcels originally authorized by an easement grant to the Forest Service. Parcel #2 (log storage) expired in 1988. The easement grant for the remaining parcels in the easement grant expires in 1995. The division is currently processing a tideland lease application that will re-authorize use of the site by the Forest Service. The Forest Service has no authorization or applications pending for the Coal Bay, Sunny Point and Cannery Creek LTF sites. The state has agreed to grant access across it's selection at Coal Bay to allow the Forest Service access to tidewater. However, the Prince of Wales Island Area Plan did not identify an LTF facility at this site.

ADNR-2  
The division observed with some concern the failure of the document in the transportation sections or unit cards to note state owned land the extension of the Indian Creek road under Alternatives 2,3 & 4 will have to cross to provide the planned access to units on the west side of Twelve Mile Arm. The state gain title to this land in 1986 subject to a reservation for the long term timber sale to KPC. The Forest Service will have to apply for 906(k) concurrence from the division for construction of this section of road.

The piece of state affected state land is classified for public recreation (undeveloped) and settlement. The Prince of Wales Island Area Plan identifies it for future residential disposal and a possible location for industrial activities. The plan identifies Indian Creek as an important community harvest area and designates a 600 foot buffer where development activities which cause negative impacts on riparian habitat or fish & wildlife harvest will not be

## Comments of the Alaska Department of Natural Resources - Bruce Johnson

ADNR-2  
(cont.)

allowed. The plan also provides for development of access into the area from the Harris River road system.

Before the division will grant concurrence the Forest Service will have to show need for the road across state owned land for the long term timber sale. Access was not reserved for independent sale activity. A right-of-way will have to be obtained for any timber sale activity under this latter program.

ADNR-3

The division has sever doubts about the need for this road to support long term timber sale activities. The proposed road does not meet the state's plans for accessing this parcel and connecting it to adjacent development in the Hollis area. Along with the Forest Service stated intent to close the road to other than timber harvest related activity the proposed road will serve no state purpose for development in the area and adversely impact other designated uses.

Alternate access to the west side of Twelve Mile Arm appears feasible from the south. As proposed, development of road access from the north adds 10.5 to 21.5 miles of additional haul to deliver logs to the LTF in Twelve Mile Arm. Much of this consists of an adverse haul up the Indian River drainage and will cause further and prolonged disruption of wildlife in this drainage. Unit development cards show the location of a road toward the south at lease halfway past the last designated unit (621-268) to Forest Road 21. Construction of this segment of road rather than the segment through state land is about the same distance and would allow for mostly favorable hauling. It could also provide for the designation of additional harvest units not otherwise possible on state land. This would improve the volume of timber per mile of road constructed which is already very low at less than a million board feet per mile.

One of the issues to be address by this DEIS was the economics of timber harvest. As proposed accessing the timber along the west side of Twelve Mile Arm from the north across state land is likely the most costly alternate due to excessive haul distance, adverse haul direction, and the amount of non-harvestable land crossed. The DEIS did not address why access was not designated into this area from the south. However, a 43% to 72% reduction in haul distance, more favorable haul direction and the ability to designate additional timber for harvest in this area would go a long ways toward paying for any addition road construction costs which might be encountered accessing the area from the south. This would also avoid construction of an otherwise unnecessary road across state land and reduce impacts to wildlife populations and recreational users in the Indian River drainage.

cc: Elizaveta Shadura  
Jim McAllister  
pideis.dnr

## Responses to the Alaska Department of Natural Resources - Bruce Johnson

ADNR-3

As noted on page 5 of Chapter 2 of the DEIS, harvest near the southwest end of Twelvemile Arm was deferred during this entry due to the cumulative visual disturbance relative to the proposed VQO for this area and the Sensitivity Level I status of the proposed campground and cabin in this area. As a result of these issues, the ID Team desired to avoid access road development in this area as well, especially since access from the south along Twelvemile Arm would result in greater "dead" road development during this entry. Access from the north is also more consistent with the new conservation strategies proposed in the FEIS. Access from the south would be inconsistent with the Viable Population Committee HCA at the southwest end of Twelvemile Arm and the refinements to this HCA made in the FEIS.



P.O. Box 113  
Klawock, Alaska  
99925

City of Klawock  
Alaska

"Site of the First Cannery in Alaska"

Phone: (907) 755-2261  
or: (907) 755-2262  
FAX #: (907) 755-2403

Comment noted.

COK-1

October 26, 1993

Lorraine Marshall  
OMB Consistency Review  
P. O. Box 110030  
Juneau, Alaska 99811

RE: AK 9310-05JJ.

Dear Ms. Marshall:

COK-1

The project is outside the boundaries of the Klawock Coastal District. However, there are impacts to the residents of Klawock as noted in the review documents.

The City of Klawock finds the project CONSISTENT with our Coastal Plan. However, we encourage the U. S. Forest Service to employ the mitigation measures outlined and to monitor the project impacts on subsistence, and fish and wildlife habitat.

Sincerely,



Marvin L. Yoder  
City Administrator

MY/dj

cc: file.

## Comments of the Southeast Alaska Conservation Council



### **Southeast Alaska Conservation Council**

SEACC 419 Sixth Street, Suite 328 Juneau, Alaska 99801 (907) 586-6942

SEAC-1

October 13, 1993

Dave Arrasmith  
Planning Staff Officer  
Ketchikan Administrative Area  
Tongass National Forest  
Federal Building  
Ketchikan, AK 99901

Dear Dave:

SEAC-1

Upon reviewing the summary for the Polk Inlet Draft Environmental Impact Statement (DEIS), we discovered that at least five (5) clearcuts are proposed that exceed the 100 acre size limitation for the hemlock-sitka spruce forest type of coastal Alaska. See DEIS, Summary at p. 15 (Table S-1); 36 C.F.R. sec. 219.27(d)(2)(setting clearcut unit size limitations for all national forests). Neither the abstract in the Summary nor Volume 1 of the DEIS inform the public that all of the draft action alternatives propose clearcutting a minimum of four (4) units in excess of the 100 acre size limitation. The "Dear Planning Participant" letter attached to the Summary is similarly silent on this matter.

According to regulations implementing the National Forest Management Act, and the Alaska Regional Guide, clearcuts exceeding the 100 acre size limitation for coastal Alaska "are permitted on an individual timber sale basis after 60 days public notice ...." See 36 C.F.R. sec. 219.27(d)(2)(ii) (emphasis added); Alaska Regional Guide at p. 3-20 (Nov. 1983). The Forest Service has completely failed to provide the public with the legally required notice. In fact, the "Dear Planning Participant" letter not only fails to provide the public with adequate notice, but it unlawfully limits the notice period to the minimum 45 day comment period provided under the National Environmental Policy Act. In order to satisfy the purpose behind giving the public 60 days notice, the public must be provided an equivalent opportunity to meaningfully comment on the action.

The failure to comply with the agency's own National Forest Management Act regulations is illegal and constitutes an abuse of authority. Such action harms the interests of SEACC, our member groups and members, and nearby local communities because, for example, it precludes the public from assessing how the proposed oversized clearcuts will impact the distribution and migration of wildlife species. This information is particularly important to local subsistence users when evaluating the impacts of the proposed action on subsistence resources.

For these reasons, we request that the Forest Service immediately re-issue the public notice of availability for the Polk Inlet DEIS. This notice should provide complete

## Responses to the Southeast Alaska Conservation Council

This letter was responded to by a letter from David Arrasmith to Buck Lindekugel dated October 27, 1993. This memo states that the DEIS and its Notice of Availability serve as Public Notice regarding proposed units over 100 acres. The public had over 45 days to comment on the DEIS. This FEIS provides further Public Notice and updates the information on these proposed units. The Project will not be implemented until 45 days after the Record of Decision is signed. Clearly, this is ample public notification regarding harvest of units over 100 acres. Therefore, the Notice of Availability for the Polk Inlet DEIS was not reissued and the DEIS comment period was not extended.

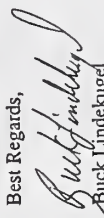
Dave Arrasmith  
October 13, 1993  
Page - 2

SEAC-1  
(cont.)

public notice of all proposed clearcuts exceeding 100 acres in the Polk Inlet project area, and toll the beginning of the 60 day notice requirement from the date the revised notice of availability is published or mailed to the public.

Please respond to this request in writing by October 20, 1993.

Best Regards,

  
Buck Lindekugel  
Staff Attorney

cc: Tongass Conservation Society  
Prince of Wales Conservation League  
Alaskans for Responsible Resource Management  
Alaska Society of American Forest Dwellers  
Alaska Women in Trees



## Comments of the Southeast Alaska Conservation Council



David Rittenhouse  
Forest Supervisor  
Ketchikan Area, Tongass Nat'l Forest  
Federal Building  
Ketchikan, AK 99901

Dear Mr. Rittenhouse:

We submit the following comments on the Polk Inlet Draft Environmental Impact Statement (DEIS) on behalf of the Southeast Alaska Conservation Council (SEACC). SEACC is a broad-based coalition of 15 volunteer citizen organizations in 12 communities ranging from Ketchikan to Yakutat. The 208,649 acre Polk Inlet Project Area is located near the communities of Hydaburg, Craig, and Klawock and includes the community of Hollis. The non-existent range of alternatives for this project propose cutting between 124 and 127 mm<sup>3</sup> of timber.

In the appeal filed challenging the Central Prince of Wales (CPOW) Final EIS and Record of Decision, SEACC, the Prince of Wales Conservation League, Tongass Conservation Society, Greenpeace Alaska and Alaskans for Responsible Resource Management raised serious questions regarding the integrity and legality of the Ketchikan Area's timber sale program. Our review of the DEIS confirms our fear that the planning shenanigans which resulted in the flawed CPOW planning decision also occurred in preparation of the proposed Polk Inlet project plan. For your information and consideration, we are submitting Appeal No. 93-10-00-0011 with all the exhibits, as well as the intervention comments and exhibits submitted by the Sierra Club Legal Defense Fund (SCLDF) on behalf of The Wilderness Society and Sierra Club relating to Appeal Nos. 93-10-00-0009 through 0013.

SEAC-2

We are concerned, in particular, with proposed cutting plans in Indian Creek and the northeast portions of VCU's 612 and 613, especially the Old Franks drainage. Indian Creek is important because it is a control area for anadromous fish studies and the site for DEC macroinvertebrate studies. Under current plans, VCU's 612 and 613 will be isolated by Native logging and then decimated by proposed cutting under the Polk Inlet project. The Forest Service should stay completely out of this area to avoid local extirpation of wildlife species.

## Responses to the Southeast Alaska Conservation Council

Comment noted. Both of the areas referred to will be entered under the 1989-94 Operating Period EIS. Among the Polk Inlet action alternatives, Alternative 5 avoids further entry into the Indian Creek drainage. Regarding the northeast portions of VCU's 612 and 613, the Forest Service has recently discovered that additional lands are encumbered, having been selected by Sealaska Corporation. This fact, along with the issue raised by your comment are being considered in the selection of the ROD.

SEAC-2

## Southeast Alaska Conservation Council

SEACC 419 Sixth Street, Suite 328 Juneau, Alaska 99801 (907) 586-6942

November 23, 1993

Dave Rittenhouse  
November 23, 1993  
Page - 2

NEPA Concerns:

SEAC-3 1. According to the DEIS (at p. 1-7), the "purpose and need" is to provide the target volume for this project necessary to provide KPC with a 3-year timber supply of 615 mmbf. The DEIS further states that it is necessary to supply KPC with 205 mmbf per year "to complete the contract." Provision B0.1 of the KPC contract, however, clearly states that 8.25 bbf is a ceiling, not a mandate. The contract further provides that the average annual harvest for any 5 year period may not exceed 192.5 mmbf. Therefore, the purpose and need stated for this project will exceed the amount of timber volume that the Forest Service is contractually obligated to provide KPC.

SEAC-4 2. The range of alternatives considered in the DEIS is based on the agency's pre-NEPA decision to clearcut 125 mmbf from the project area regardless of the capacity of the project are to supply that volume of timber or consequences to the maintenance and enhancement of other important forest values, such as wildlife, fish, and subsistence uses of those resources. Both NEPA and ANILCA require the Forest Service to consider all reasonable alternatives.

The artificially narrow range of alternatives considered in this DEIS fail to respond to either public concerns or applicable legal requirements. It is crucial to note that even if the KPC contract or other applicable law and/or resource policies required the Forest Service to provide a preset volume of timber from the project area, NEPA nevertheless requires the agency to consider all reasonable alternatives, including providing a lesser volume of timber from the sale. Even prior to the enactment of the TTRA, the Tenakee II decision held that the Forest Service had the authority to cancel any contract that "would result in serious environmental degradation or resource damage." See 915 F.2d at 1312. The court further stated that "[w]e believe that the Service's failure seriously to consider any alternative to the rigid application of its own interpretation of the contract requirements raises serious questions of compliance with applicable law." Id. The reasoning in that court decision is equally applicable to the issues involved with this proposed project and applies with even more force now that Congress has unequivocally directed the Forest Service to seek to meet its contract obligations to KPC only after assuring that such activities are "consistent with providing for the multiple use and sustained yield of all renewable forest resources." See TTRA, section 101. Based on the serious environmental harms and unsustainable logging operations under the 1989-94 EIS, and from implementation of the CPWW and North Revilla decisions, this DEIS should have considered an alternative which terminates the KPC contract.

SEAC-6 3. The Forest Service continues to rely on the Supplemental Draft EIS for the Tongass Plan Revision (TLMP SDEIS) for its cumulative impact analysis. That analysis is based,

SEAC-3 Since a portion of the Polk Inlet EIS area is located outside the Primary Sale Area for the KPC Long Term Contract, volume from the project is expected to contribute toward the Ketchikan Area Independent Timber Sale Program. Also, volume from the Polk Inlet EIS will contribute toward the need to provide a 3-year timber supply, but in actuality will likely be implemented over a 3-5-year period. This means that the volume will likely contribute toward more than one "3-year period." Also see the response to GRP-5.

SEAC-4 Comment noted. See responses to ADFG-3 and SEAC-9.

SEAC-5 Terminating the KPC contract is clearly beyond the scope of this EIS. However, two no-action alternatives are considered.

SEAC-6 The Polk Inlet EIS does not rely on the TLMP Draft Revision Supplement for its cumulative impact analysis, but incorporates it by reference where a particular analysis in the TLMP Draft Revision is relevant and appropriate. The Polk Inlet EIS does not tier to the draft document.

## Comments of the Southeast Alaska Conservation Council

Dave Rittenhouse  
November 23, 1993  
Page - 3

SEAC-6  
(cont.)

however, on inaccurate information and analysis. In addition, it is unlawful for the agency to rely on analysis contained in a "draft" planning document.

SEAC-7

4. The DEIS fails to take a "hard look" at impacts to watersheds. In assessing impacts to watersheds from proposed activities, the DEIS relies on the 35% permissible ground disturbance to any watershed within a 15 year period standard unveiled for the first time in the TLMP SDEIS. Application of this blanket standard is unsupported by credible scientific information. See D.L. 26701 (Letter from Bartos to Rittenhouse, Jan. 2, 1993). Anticipated impacts to the 23 watersheds in the Polk Inlet project area need to be evaluated based on watershed-specific information and analysis. Moreover, the DEIS needs to consider and disclose information relating to the long-term reduction in stream flows caused by increased rates of evapotranspiration in clearcut areas. We could find no mention of this phenomena in the DEIS or reference to the most recent scientific study relating to evapotranspiration. See Exhibit 19 to SCLDF's CPWF Intervention Comments.

SEAC-8

5. The DEIS fails to disclose the existence of the proactive stream and watershed protection strategy designed by an interdisciplinary team of scientists from the Forest Service and Bureau of Land Management. The DEIS also fails to disclose the science behind the strategy or apply the science to the Polk Inlet project area. The absence of any discussion of the PACFISH strategy as applied to this project prevents the Forest Service from taking a hard look at the environmental consequences from the proposed project on streams and watersheds in the project area and significantly impedes informed public participation in the decision making process. It should be noted that, although the Forest Service has been excused from implementing the interim standards proposed in PACFISH in 1994, the agency has not been insulated from disclosing and considering the scientific basis for, and application of, the strategy in project planning processes.

SEAC-9

6. The Forest Service's failure to prepare an EIS when developing the KPC timber supply schedule violates NEPA and ANILCA.

The DEIS unreasonably restricts the range of alternatives considered by claiming that the "purpose and need" for this project is to "provide timber volume that will contribute to a 3-year current timber supply requirement of the KPC contract..." DEIS at 1-5. The DEIS goes on to claim that the timber volume determined for the Polk Inlet project area, 125 mmbf, was based on "the current schedule to provide a 3-year timber supply of 615 mmbf for the KPC Long-term Contract ..." Id. This scheduling decision was made by unidentified persons outside any public process and without meaningful consideration of environmental impacts or alternatives.

## Responses to the Southeast Alaska Conservation Council

SEAC-7

Refer to responses to ADFG-33 and RM-3. Additionally, long-term effects to streamflow are discussed in the EIS.

SEAC-8

Refer to response to ADFG-34. Additionally, the riparian management standards and guidelines referred to (termed PACFISH) are being evaluated by the Forest Service for use in Alaska. However, so far that is just a proposal, and in fact any use of these guidelines in Alaska has been deferred so that more study of the potential need or applicability in Alaska can be done. The PACFISH strategy has been released as an Environmental Assessment (EA) for the forests east of the Cascade Mountains in Oregon, Washington, Idaho, and portions of California (USDA Forest Service and USDI Bureau of Land Management, March 1994, Environmental Assessment for the Implementation of Interim Strategies for Managing Anadromous Fish-producing Watersheds in Eastern Oregon and Washington, Idaho, and Portions of California). This EA is undergoing public comment and finalization during preparation of the Polk Inlet FEIS. A similar riparian management strategy is applied in the President's Forest Plan for federal lands in the Pacific Northwest in the range of the northern spotted owl (USDA Forest Service and USDI Bureau of Land Management, February 1994, Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl). Neither the EA nor the President's Forest Plan direct the use of this strategy for Alaska. In any case, it would be premature to consider PACFISH type guidelines for individual projects in the Tongass National Forest. The EIS documents in-depth analysis and concern for fisheries, and the TTRA and other stream buffers. The procedures being used for this project have been demonstrated to adequately protect fisheries resources as discussed in the EIS. This analysis used the best and most recent scientific information relevant to Alaska.

SEAC-9

The TLMP, as amended, is a programmatic document which determined available timber for the Forest, and decided on the land use designations (LUD's) for each of the 867 VCU's on the Forest. Each LUD describes the broad purpose of management for each area of the Forest. LUD's III and IV permit timber harvest and road construction activities. The TLMP detailed management direction/emphasis for each Management Area and scheduled specific Management activities for two specific time periods. It also identified anticipated management outputs from the Ketchikan Area timber volume. All of these decisions were made within the NEPA process.



SEAC-9  
(cont.)

The KPC timber sale schedule is a major federal action under the CEQ regulations, 40 CFR 1508.18(b). There are currently two other timber sale offerings on Prince of Wales Island, the North Prince of Wales and Control Lake projects, under preparation. There are two other timber sale offerings, the Central Prince of Wales and North Revilla, for which Records of Decision have been recently issued. All of these offerings "[a]re interdependent parts of a larger action and depend on the larger action for their justification." 40 CFR 1508.25(a)(1)(iii). The larger action, of course, is the development of a current timber supply of at least 615 mmmbf for KPC over the next three years. This section of the CEQ regulations confirms our position that the Forest Service must prepare an EIS, either at the project or programmatic level, that considers a meaningful range of alternative timber sale schedules to comply with the KPC contract. The schedule disclosed in Appendix A to the DEIS does not satisfy these conditions because it was adopted without public participation, fails to consider any alternative timber sale schedules or take a hard look at the impacts of the schedule on the environment.

Nor can the agency rely on the timber schedule in the TLMP Amendment to justify development of a Current Timber Supply schedule for KPC outside of a NEPA process. As noted in the Amendment (at p. 17): "Inclusion in the schedule does not necessarily mean an individual activity will take place." Tongass managers clearly expected that "[f]urther analysis, future budgets, and future demands and markets for the Forest's goods and services will determine which activities will (sic) be implemented." *Id.* As noted below, however, the Forest Service has failed to conduct the analysis required by the TLMP Amendment necessary to justify adoption of the Current Timber Supply schedule pursuant to the KPC contract.

SEAC-10

7. The DEIS's reliance on the forest-wide TLMP databases violates NEPA. Both the Alaska Regional Guide (at p. 3-21) and the TLMP Amendment (at p. 201), recognize that it is imperative that the most current timber inventory data be used in project planning because of the inherent shortcomings in applying forest-wide TLMP databases to small project areas. In fact, the TLMP Amendment acknowledges that the forest-wide databases were not "designed or intended for direct project level use." The analysis in the DEIS, however, relies on the TIMTYPE database developed for the TLMP SDEIS. The Forest Service erroneously directed this project contractor to rely on this "draft" analysis. Even worse, this 1991 TLMP database has been shown to be accurate and unreliable. NEPA requires that in preparing an EIS an agency must insure that it discloses "high quality" information to the public and that it rely upon "accurate" scientific analysis. See 40 CFR 1500.1(b). Basing project decisions upon information sources known to be faulty violates NEPA.

SEAC-9  
(cont)

The KPC schedule was developed under the direction of the TLMP, and to comply with the KPC long-term timber sale contract. All projects proposed in that schedule undergo site-specific NEPA analysis and documentation prior to implementation.

The CEQ regulations (40 CFR 1502.13) state that the EIS "... shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." The Forest Service exercises its discretion in determining the proposed action's purpose and need.

Appendix A in the Polk Inlet EIS provides more detailed analysis that leads to the determination of the purpose and need volume.

SEAC-10

The TIMTYP maps represent the best available information regarding timber type and volume for an area as large as a project area. Field verification and stand exams indicated that the TIMTYP maps represented a reasonable approximation for the Polk Inlet Project Area. The Forest Service is currently investigating other techniques to gather timber type and volume information over a large area and is planning to update the TIMTYP maps as well.

## Comments of the Southeast Alaska Conservation Council

Dave Rittenhouse  
November 23, 1993  
Page - 5

SEAC-11

8. The maps developed for the DEIS are of the poorest quality we have ever seen for a major EIS. The small scale used make the maps almost impossible to read. The maps should be modified to show topography, existing CFL in the project area, existing roads and clearcuts, proposed roads and clearcuts, previously designated retention, and the location of volume class 4, 5, 6, and 7 stands. The extent of logging on private lands adjacent to the project area should also be delineated; this information is critical for the public to assess past, proposed and cumulative impacts to wildlife habitat in the project area.

SEAC-12

9. According to the DEIS, karst or cave features were observed in VCU's 624, 674, and 675. The information disclosed in the DEIS regarding this significant resource and the assessment of impacts to the resource is completely inadequate. New information has become available regarding the cave and karst resource on Prince of Wales, as well as the adequacy of the existing standards and guidelines for protecting this remarkable resource. A panel of scientists hired by the Forest Service to evaluate the karst (land formed from limestone) and cave resource on Prince of Wales Island and nearby islands this past summer recently outlined their draft evaluation and conclusions. See Ozark Underground Laboratory, Karst and Cave Resource Significance Assessment Ketchikan Area, Tongass National Forest, Alaska (Draft Report of the Karst Resources Panel)(Oct. 13, 1993).<sup>1</sup> The panel's "final" report is expected in early December, 1993. The panel found incredible diversity of karst resources, features and cave types present in the study area which provided abundant archeological and paleontological resources, discovery of a new and undescribed cave-adapted invertebrate, as well as "[t]he unique opportunity to study evolution and adaptation of invertebrates in the archipelago setting with a complex geologic and glacial history." *Id.* at 3-4. The draft report also concludes that, although efforts taken by the Ketchikan Area to protect cave resources have been laudable, the actions taken have been inadequate in many cases. *Id.* p. 70. The panel also found that recharge area delineation and vulnerability mapping were "appropriate and necessary for sound land management in the karst portions of Prince of Wales." *Id.* at 55.

This Blue Ribbon Panel report is significant new information that the Forest Service must incorporate into this planning decision. Most importantly, this information will likely lead to removing suitable timber from the project area timber base. The contractor should perform and disclose the results of the delineation and vulnerability mapping recommended by the panel.

---

<sup>1</sup>This draft report is attached to the Sierra Club Legal Defense Fund's intervention comments in the CPOW appeal as Exhibit 18.

## Responses to the Southeast Alaska Conservation Council

SEAC-11

See response to GRP-17. Also, please note that the individual alternative maps do show existing CFL (both low and high volume), existing roads and clearcuts, proposed roads and harvest units, and other information.

SEAC-12

Refer to response ADFG-39.

**TTRA Comments**

SEAC-13

1. The DEIS discloses that both Management Areas within the project area are currently out of compliance with the proportionality requirements of the TTRA. Please explain the reasons for this. Didn't the Forest Service modify the 1989-94 EIS to comply with this TTRA requirement. In addition, none of the alternatives appear to have been developed to comply with TTRA proportionality requirements.

As expressed in SEACC comments on other KPC logging plans (CPOW and Revilla), the Forest Service reliance on the TIMTYP data base for its proportionality analysis is unreasonable. For additional information on SEACC's concerns regarding use of the TIMTYP database, and the Forest Service's interpretation of Section 301(c)(2) of the TTRA, please refer to Appeal No. 93-10-00-0011 (pages 17-18) and the referenced exhibits.

SEAC-14

2. The Forest Service's record regarding implementation of TTRA's minimum buffer requirements is dismal and its monitoring of buffer implementation is non-existent. See Exhibits L and L-2, Appeal No. 93-10-00-0011.

SEAC-15

3. The Forest Service has misinterpreted the TTRA's "anti-backlog" provision as a mandate to provide KPC with a 3 year backlog of timber. See Appeal No. 93-10-00-0011 at p. 16.

SEAC-16

4. Forest Service has not satisfactorily shown that this project is necessary to meet "market demand" for timber from the Tongass. By equating "market demand" with mill capacity, the Forest Service ignores the fact that KPC has violated a basic term of its contract by increasing the capacity of its mill beyond that specified in the contract. In addition, the Forest Service's failure to modify KPC's contract to halt the "banking" of purchaser road credits by KPC has resulted in KPC paying less than 1 percent the value of the timber it has cut since 1990 and the Forest Service paying KPC \$9.4 million dollars in cash. See Appeal No. 93-10-00-0011 at p. 16, and Exhibit F. Finally, we understand that the cost of preparing these EISs are costing approximately 10 times the amount of stumpage the government will receive from KPC. We request that the Forest Service disclose a complete cost recovery analysis for this project, as well as a complete TSPIRS analysis, in the FEIS.

SEAC-17

SEAC-18

Moreover, the Forest Service's primary obligation is not meeting contract requirements, or meeting the excessive production requirements of KPC's manufacturing facilities, but to seek to meet market demand, and then only "to the extent consistent with providing for the multiple use and sustained yield of all renewable resources."

SEAC-13

The calculation of proportionality has been refined and the alternatives have been modified to bring the Management Areas into compliance with the TTRA baseline. See response to ADFG-9.

SEAC-14

The Forest Service, due in part to joint monitoring efforts, has recognized where some buffers did not meet minimum width requirements in the past. Specific policy changes have been made to address proper implementation of minimum buffer requirements. In a memo to District Rangers dated December 31, 1992, the Ketchikan Area Forest Supervisor directed that actions be taken immediately to ensure that all TTRA buffers meet the minimum 100-foot width, or the minimum width prescribed to meet the standards and guidelines for the streams when the buffer is greater than 100-feet in width. These actions include a quality control program to ensure accurate measurement of the minimum buffer width and length, random sampling techniques to monitor the TTRA units, and training of personnel on the full implementation of TTRA. The District Ranger will be held accountable for proper implementation of TTRA requirements. Monitoring will focus on concerns about application and adequacy of buffer prescriptions.

SEAC-15

The 3-year timber supply requirement in the revised KPC long-term contract (B0.61 and B0.62) was not included as a "misinterpretation" of TTRA provisions, but is a replacement of the 5-year operating period requirements of the old contract (in Section 1(c)1). The contract prior to the TTRA gave KPC a timber supply sufficient for a 5-year period, with the selection of logging units done 3 years in advance of each 5-year period. The new contract replaces those provisions with provisions consistent with the independent timber sale program. Elsewhere in the contract, Section B6.36 (Substantial Harvest) includes the TTRA requirement for timber to be harvested within a 3-year period.

SEAC-16

The question of whether or not KPC's current mill capacity (of 600 short tons per day) may be a violation of the long-term contract is beyond the scope of the Polk Inlet Project EIS. This additional capacity beyond that specified in the contract (300 to 525 short tons per day) had no bearing on the calculation of remaining contract timber supply obligations, or the annual amount to supply. These amounts were based on the timber volume originally projected under the contract (see response to GRP-5).

The issue of purchaser road credit transfers still needs to be resolved for the General Accounting Office to certify "complete" compliance with the TTRA direction regarding the long-term sale contracts. This resolution is being pursued by the Forest Service. Resolution of this particular issue has no bearing on the decision being made for this project, nor is it apparent how a change in the transfer of purchaser credits would alter the market demand for timber.



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### ANILCA Comments

**SEAC-19** 1. The Forest Service failed to consider impacts to subsistence uses and resources in selecting and scheduling this project. Every planning decision on the Tongass must assure that it "cause[s] the least adverse impact possible on rural residents who depend upon subsistence resources of such lands." ANILCA, Section 802(1). The DEIS fails to show whether or not other areas were available for logging at this time which would have less impact on subsistence than this project.

**SEAC-20** 2. None of the action alternatives avoids significant subsistence harvest and habitat areas. The claim that not cutting in "high use" subsistence areas adequately protects the "highest value subsistence use areas," ignores the fact that maintaining subsistence use of wildlife and fish resources requires maintaining sufficient habitat for wildlife and fish. No information is disclosed in the DEIS supporting the agency's assumption that avoidance of "high use" subsistence areas adequately protects subsistence users.

**SEAC-21** 3. The DEIS fails to adequately consider and assess the impact of logging camps on competition for subsistence resources.

**SEAC-22** 4. The proposed subsistence findings listed in the DEIS are arbitrary and not in accordance with law. See Appeal No. 93-10-00-0011 at p.40-41 and cited exhibits.

**SEAC-23** 5. Adoption of The Current Timber Supply Schedule outside the NEPA process violates Section 810(A) of ANILCA.

Under Section 810(a) of ANILCA, the Forest Service must evaluate the impact of its actions on subsistence and consider alternatives "which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes." 16 U.S.C. § 3120(a). For the same reasons that selection of the KPC Current Timber Schedule outside the NEPA process violated NEPA, it also violates this requirement of ANILCA.

ANILCA, however, contains additional substantive requirements. The Forest Service may make a decision restricting subsistence only if it is "necessary, consistent with sound management principles for the utilization of the public lands." 16 U.S.C. § 3120(a)(3)(A). The Ketchikan Area simply cannot support a rational conclusion that the significant restriction on subsistence envisioned in this DEIS is "necessary" without considering all reasonably possible alternative timber sale schedules, including going outside the contract sale area.

In fact, the only defense the Ketchikan Area has offered for its determination that restricting subsistence uses in the Polk Inlet project area is necessary is that any

## Responses to the Southeast Alaska Conservation Council

SEAC-17 The planning costs of preparing the EIS's are incorporated into the TSPIRS analysis.

SEAC-18 "Seeking to meet market demand" is TTRA direction and was included in the project's purpose and need. However, the need for timber as discussed in the FEIS (Chapter 1 and Appendix A) was based in part on the contract requirements. Seeking to meet market demand can provide further reason to supply timber at the maximum level the contract allows, but not to exceed that maximum. Also see responses to GRP-5 and SEAC-16.

SEAC-19 See response to ADFG-46.

SEAC-20 ANILCA establishes a process for evaluating subsistence effects in Section 810. When projects may significantly restrict subsistence uses, agencies must determine that such restriction is necessary, consistent with sound management principles, and that it will involve the minimal amount of land necessary; and they must take "reasonable steps ... to minimize adverse impacts upon subsistence uses and resources resulting from such actions" (Sec. 810(a)(3)). ANILCA does not require the selection of the alternative with the least possible impact, which would in most cases be the "no action" alternative.

Finally, the Forest Service does not automatically assume that avoidance of "high use" subsistence areas adequately protects subsistence users. All alternatives include measures to reduce effects on subsistence. For example, important areas (both for deer and for subsistence users) such as beach and estuary fringe, and most riparian areas, are completely avoided. Additional mitigation of effects on subsistence has been incorporated into the alternatives in a number of ways: (1) mitigation through avoidance of geographic areas; (2) site-specific measures to mitigate fish and wildlife impacts; and (3) road closures and other access management to mitigate competition for subsistence resources. These mitigation measures are described in Chapter 2.

SEAC-21 The EIS has been edited to better address the effects on wildlife of local harvest associated with camp personnel.

SEAC-22 The ANILCA Section 810 process was used to evaluate the significance of impacts on subsistence, and to reach a determination in a NEPA document as provided for in ANILCA Section 810 (b). In compliance with subsection 810 (a) requirements, an evaluation was made of the effect of the proposed action on subsistence uses and needs, the availability of other lands for the proposed action, and other alternatives which reduce or eliminate the proposed action from lands needed for subsistence (DEIS

SEAC-22  
(cont)

Chapter 4, pp. 151-174). This evaluation was refined in the FEIS. The findings of this evaluation were that the proposed action would have a significant possibility of a significant restriction on subsistence use for martens and black bear and that a restriction is possible for deer prior to the year 2054 in the Project Area. Because of this finding, public hearings were held in Hollis, Hydraburg, Klawock, Craig, Saxman, and Ketchikan. A determination was made that the possible subsistence restriction is necessary and consistent with sound management principles for the utilization of the National Forest, that the minimum amount of public lands necessary to accomplish the purpose of the proposed action will be used, and that reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from the action. The ANILCA Section 810 Evaluation and Determination process is complete and supports the findings.

The preferred alternative reflects efforts to minimize effects on subsistence resources. It defers timber harvest in part of the Indian Creek drainage, much of the area along Twelvemile Arm, and the Cholmondeley Sound area. It also allows only helicopter logging, thus avoiding further road building, in the area adjacent to McKenzie Inlet.

SEAC-23

Appendix A in the FEIS describes the reasons for scheduling timber harvest within the Polk Inlet Project Area at this time. Furthermore, it concludes that to meet long-term sale volume commitments, almost all Management Areas containing LUD III and IV lands would have at least some level of timber harvest entry by 2004.

SEAC-24

Comment noted. The TLMP is currently undergoing revision and information produced by recent project-specific EIS's will be considered.

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SEAC-23  
(cont.)

alternative will cause a significant possibility of a significant restriction "somewhere in the Forest." DEIS at 3-316. The DEIS, however, fails to cite any supporting data or information which supports this conclusion. The reason for this is simple: there is none. The Forest Service has never conducted the cumulative impact analysis for logging under the KPC long-term contract required by both NEPA and ANILCA. The 1979 TLMP can not contain any analysis of the cumulative impact of subsistence within the requirements of ANILCA because it was drafted before ANILCA became effective.

Neither can the Forest Service rely on the draft cumulative impact analysis contained in the TLMP SDEIS, which concludes that "all of the alternatives [in the TLMP], if all permissible projects were fully implemented, have the potential to impact subsistence uses of deer. . . ." TLMP SDEIS at 3-763. Simply because each alternative in the forestwide plan has the potential to impact subsistence uses of deer, if all permissible projects are fully implemented, that fact does not rationally lead to the conclusion that any possible alternative project undertaken to make timber available to KPC at this time will have the same restriction on subsistence regardless of size, location, and other relevant factors.

In fact, a review of the TLMP SDEIS proves exactly the opposite. Appendix K to the TLMP SDEIS reveals that there are huge differences -- several orders of magnitude -- in the subsistence uses of different Wildlife Analysis Areas for deer. There are also differences in habitat carrying capacity, historical ties of different communities to different areas, accessibility, timber volumes, and other factors that influence subsistence use and suitability for logging. These facts prove beyond a doubt that different alternatives will have vastly different impacts on subsistence, and that there are likely alternatives that could have a much smaller restriction on subsistence than the arbitrary schedule currently being followed.

#### NFMA Comments

SEAC-24

1. The DEIS reveals that projected timber cutting on Prince of Wales Island can occur only if economic conditions improve to allow over twice as much marginal timber to be cut. In short, the TLMP timber base for Prince of Wales Island is inflated; the ASQ for the island needs to be lowered by at least 18% under current conditions. More importantly, by 2054, with the cutting of virtually all suitable and available old-growth on Prince of Wales Island, other resources, notably wildlife and biodiversity, and by extension subsistence, will crash. For example, the DEIS reveals (at p. 4-116) that if cutting proceeds at planned levels "landscape-level biodiversity would decline significantly." If the Maybeso Experimental Forest, only one significant block of old growth would remain -- the Old Tom Research Natural Area. The rest would be in isolated small patches or stream buffers--travel corridors to nowhere. This analysis

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SEAC-24  
(cont.)

demonstrates once again that TLMP predictions are completely off the wall. The projections in TLMP are shown to be fantasy--unsustainable for all resources.

SEAC-25

2. The DEIS fails to follow the requirements for identifying, designating, and maintaining wildlife retention specified in the current TLMP, as amended in 1986. NFMIA also requires all project-level decisions made by a Forest Supervisor to be consistent with the land management plan. 36 CFR 219.10(e). Although the Forest Service started the forest plan revision process on the Tongass in 1990, a "revised" TLMP remains uncompleted. In addition, the Forest Service has never amended the "plan implementation direction" provided for in the 1985-86 TLMP Amendment.

We were unable to discover any mention in the DEIS regarding how the Retention Factor Method is to be applied to this sale, as required by the 1979 TLMP, as amended. Figure 3-19 at p. 3-118 presents a map showing the location of previously designated retention areas. Table 3-44 at p. 3-119 presents acres of unlogged retention and extended rotation acres in each of the VCU's within the project area. The DEIS fails to disclose, however, how much of the retention acres will be cut in the proposed plan. We request the Forest Service to specify how many acres of the 18,229 unlogged retention acres are on the chopping block for this project and to identify which units are located in existing retention acres. This type of information is critical for SEACC members to assess the short-term and cumulative effects to important wildlife habitat from this proposed project. The DEIS further fails to assess the environmental consequences associated with the loss or replacement of retention acres. The absence of this information in the DEIS precludes the Forest Service from providing a "full and fair discussion" of environmental impacts to wildlife from this timber sale as required by NEPA. See 40 CFR 1502.1.

Of the 90,060 acres of commercial forest land (CFL) identified in the DEIS (see Figure 3-10 at p. 3-72), only 67,031 acres are identified as tentatively suitable and available CFL. Approximately 24% of these acres were not considered for this project because these acres consisted of 2nd growth forest. In addition, the DEIS excludes acres which include areas within beach fringe, estuarine and stream buffers. None of the identified adjustments made to the tentatively suitable and available CFL base, however, exclude the acres previously identified as retention or extended rotation acres. According to the Tongass Land Management Plan Report (Admin. Doc. #139, Nov. 1984, at p. A-5), acres retained for wildlife habitat are "excluded from the acreage basis for timber harvest calculations." We are unable to determine from this DEIS whether or not retention acres were included in the acreage base considered available and scheduled for logging at this time. Although the suitability classification for the Tongass is undergoing review in the forest plan revision process, that process has been stalled for over a year and a final

## Responses to the Southeast Alaska Conservation Council

SEAC-25

The old-growth retention strategy developed for the project meets or exceeds the TLMP as the amended retention factor method.



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SEAC-25  
(cont.)

decision is not expected shortly. Neither the Forest Service, nor its contractor, have the authority or discretion to adopt the draft suitability classification until a final decision is reached. All previously identified retention acres must therefore be deleted from the timber base considered for this project.

SEAC-26

3. Logging on steep slopes and unstable soils

According to the 1984 TLMP Evaluation Report (at A-5):

"The retained acres are not the only CFL acres which are excluded from the acreage basis for timber harvest calculations. Tongass-wide, a total of 66% of the CFL has not been scheduled for harvest in TLMP ... This unscheduled CFL includes the above retained acres ... [and] CFL in LUD's III and IV on slopes greater than 75%." (emphasis added).

Unlike other recent EIS's, the Polk Inlet DEIS lacks a clear statement revealing how much logging will occur on slopes with greater than 75% gradient. A cursory review of the unit cards, however, shows that several units are proposed on very steep slopes with soil stability problems. Whether or not helicopter logging will reduce the risk of slides from such units is besides the point; the Forest Service is ignoring existing forest planning direction by including such acres within the timber base for this proposed project. All areas with slopes over 75% should be deleted from the timber base.

The slope and soil stability classification for each unit should be listed in the FEIS. This information is essential for the public to assess the effect of proposed alternatives on soil stability, water quality and regeneration. The importance of this information is underscored by the recent widespread flooding and landslides which triggered Governor Hickel's disaster area declaration for Prince of Wales Island. We understand that many of the reported slides occurred along the road from Hollis to Hydaburg. We request disclosure of information on the location, extent, impacts and probable causes of these landslides in the FEIS. In addition, the costs associated with repairing damaged roads and culverts and stabilizing slopes need to be disclosed and incorporated into any cost/benefit analysis prepared for this project.

SEAC-27

4. The DEIS fails to rely on the most recent, project area-specific inventory data. Serious questions are also raised as to whether cutting levels based on this poor information are truly sustainable. Given the significant new information that has recently arisen, we are very concerned about your reliance on the timber base identified in the original TLMP, as well as draft revision. This significant new information includes: the Ozark Underground Laboratory's preliminary findings on the national and international significance of karst and caves on Prince of

SEAC-26

Refer to response to ADFG-5. Additionally, some of the recent slides in the Harris River drainage are discussed in a recent Ketchikan Area report (Craig Ranger District, December 3, 1993, Harris River Valley Slides). Discussion of these slides was added to the Soils section in Chapter 3 and the report was added to the planning record. The cost associated with these events is not part of the Polk Inlet Project and is not part of the decision to be made from the information in this EIS.

SEAC-27

This comment refers to a variety of separate issues. Refer to responses to ADFG-6 and SEAC-10 (regarding the timber type database), ADFG-16 (regarding viable populations), ADFG-39 (regarding cave and karst resources), and SEAC-9 (regarding PACFISH).

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SEAC-27  
(cont.)

Wales Island; the interagency recommendations on riparian management (PACFISH); site-specific logging plans which demonstrate that the TLMP database is unreliable; and, the recommendations by the Interagency Viable Population Committee. When the likely falldown due to operability and economics is considered as well, the agency's reliance on this timber inventory begins to unravel. This project should not go forward until this information is fully integrated into the TLMP plan.

In preparing this DEIS, the contractors hired by the Forest Service relied upon the TIMTYPE database to identify tentatively suitable and available timber and the specific location of high-value wildlife habitat, as well as to comply with the TTRA's proportionality requirements. No matter what SEACC, state agencies, Forest Service employees and outside experts say the Forest Service is bound and determined to use this timtype database. See Appeal No. 93-10-00-0011 at pgs. 10-12.

SEAC-28

5. The DEIS fails to develop a scientifically credible plan for maintaining viable and well distributed populations of wildlife.

Although the DEIS describes the Interagency Viable Population Committee recommendations, the DEIS fails to adopt any of the recommendations or provide a scientifically credible alternative method for insuring the viable and well-distributed populations as required by the National Forest Management Act. It should be noted, that the existing forest plan does not contain a strategy for insuring that viable, well-distributed wildlife populations are maintained. Instead, the current TLMP attempts to address viability by applying the Retention Factor Method. As noted above, however, the DEIS fails to follow the direction provided in the plan relating to retention. Consequently, the DEIS does not assure that viable populations of wildlife will be maintained.

Of particular concern to SEACC and its members is the adequacy of the agency's efforts to insure viability of the goshawk and murrelet. See Appeal No. 93-10-00-0011 at pgs. 32-38, and exhibits. As the Fish and Wildlife Service has repeatedly advised the Forest Service, the present goshawk management guidelines used on the Tongass lack credibility and are ineffective because the protection of known nest sites fails to adequately address the loss of foraging habitat or the protection of important foraging areas within the goshawks' home range. The agency's decision not to disclose this conflict among experts in the DEIS violates NEPA because it fails to promote informed participation by the public. Recent information also suggests that the Forest Service must take "hard look" at the viability of the Franklin's grouse within the project area.

Has the Forest Service prepared a "Biological Evaluation" for this project?

## Responses to the Southeast Alaska Conservation Council

SEAC-28

The viable population analysis has been refined in the FEIS. The Retention Factor Method has been incorporated.

The Forest Service is aware of the differences of opinion about the potential effectiveness of the northern goshawk guidelines. The guidelines are currently undergoing review and may soon be revised. Please note that there are no known goshawk nest sites in the Polk Inlet Project Area.

Potential effects on the Franklin's grouse are covered in the FEIS. A Biological Assessment is included in Appendix J of the FEIS. The Project Biological Evaluation is covered by Chapters 3 and 4 of the FEIS.

SEAC-29	<p>6. NFMA requires the Forest Service to maintain an inventory of renewable resources on a continuing basis. 16 U.S.C. 1603. The practice of unit expansion followed on the Ketchikan Area prevents the Forest Service from maintaining this required inventory and impedes the agency's ability to assure that forest resources are managed on a sustained yield basis. Without accurate resource inventory information, neither the agency or its contractors can accurately assess and disclose information to the public before actions are taken, as required by NEPA.</p>	SEAC-29	Refer to response to ADFG-41.
SEAC-30	<p>7. The Forest Service has a mandatory duty under NFMA and its own planning regulations to monitor the effects of approved management activities. The DEIS is replete with claims that implementation of BMPs and TTRA buffer requirements will assure protection of fish habitat and water quality protection. The DEIS, however, fails to provide a credible scientific basis for these claims. Not only has the Forest Service failed to conduct adequate implementation monitoring but it has not yet begun an effectiveness monitoring program. Our review of monitoring efforts on the Ketchikan Area for 1991 and 1992 leads us to conclude that the Forest Service has failed its responsibility under NFMA, the Clean Water Act, and NEPA of reliably demonstrating that implementation of BMPs will not cause impairment of beneficial uses or exceedances of water quality standards. By this reference, we incorporate the two BMP reports prepared by SEACC in 1992 and 1993. <u>See Exhibits L and L-2 (Appeal No. 93-10-00-0011).</u> We request that the Forest Service make available the results of all relevant monitoring in the FEIS.</p>	SEAC-30	<p>BMP's have been designed to assure compliance with water quality standards, and it is not just continued monitoring that assures their effectiveness. BMP's have been in use since the mid-1980's. They were developed in conjunction with State and other federal agencies, and are recognized by the Environmental Protection Agency as the primary control mechanism for nonpoint sources of pollution on National Forest System lands (FSH 2509.22 - Soil and Water Conservation Handbook). Additionally, the EIS cites recent studies that demonstrate the effectiveness of BMP's in maintaining water quality (MacDonald 1991; EPA 1993). Two recent reviews of BMP effectiveness published since the release of the DEIS also demonstrate their usefulness in attaining water quality standards (Binkley and Brown 1993a, 1993b).</p>
SEAC-31	<p>8. NFMA requires the Forest Service to treat the natural resources of our forests, such as wetlands and soils, as controlling, co-equal factors in forest management. The amount of clearcutting proposed for this project on forested wetlands, steep slopes and unstable soils does not demonstrate compliance with this substantive limitation.</p>	SEAC-31	<p>The Ketchikan Area BMP Monitoring Reports for 1991 and 1992 and the Ketchikan Area Monitoring and Evaluation Report FY 1993 are included in the project planning record. Incidence of inadequate or incomplete implementation were noted for both years, along with recommendations for improving implementation. The 1992 report documents a noticeable improvement over 1991. The 1992 report found that overall, BMP implementation was good. Of 421 ratings given for individual BMP's (for either harvest units or roads) two-thirds received a rating of "fully implemented", and 17 percent were rated "intention partially met". For only 1 percent was the intention not met, and for less than 1 percent was there no attempt made to implement the BMP. Data collection for 1993 was not completed in time for incorporation into the Ketchikan Area Monitoring and Evaluation Report deadline of December 1, 1993. It will be included in the 1994 report. These data demonstrate that the requirements of NFMA, the Clean Water Act, and NEPA have been met.</p>
SEAC-32	<p>9. The amount of past and proposed clearcutting within the project area will result in the spread of a monoculture across Prince of Wales Island. As a result, serious questions are raised concerning the Forest Service's ability to maintain biodiversity in the project area and Prince of Wales Island. <u>See DEIS at p. 4-116.</u></p>	SEAC-31	<p>Refer to response to ADFG-5. Additionally, the EIS demonstrates that expected soil disturbance is below the 15 percent level of reduction in inherent soil productivity (FSM 2554.03; see Chapter 4, Table 4.-2). Further, all timber harvest within the Project Area, including that of forested wetlands, is limited to acres determined to be suitable for such harvest. The identification of suitable acres includes, as one criteria, the assurance that adequate restocking will occur within 5 years of final harvest (this is an NFMA requirement). The fact that growth rates may be slower on forested wetland sites does not make these sites unsuitable for harvest provided that adequate restocking can be achieved. The EIS discusses effects to forested wetlands such as possible temporary increases in soil moisture until vegetation is reestablished. There is no evidence or analysis showing that irreversible damage to forested wetland functions will occur.</p>
SEAC-33	<p>10. In letter dated 10/13/93 and 10/26/93, SEACC requested that the public notice of availability for the Polk Inlet DEIS be corrected and re-issued and a 60 day comment period be tolled from the date the notice was reissued. This request was made because the DEIS proposes a number of over-sized cutting units and the agency's NFMA regulations require that the public be given 60 days public notice. In response, the Ketchikan Area denied our request because cutting "these units will not be permitted until well after 60 days has elapsed." Letter from Arrasmith to Lindekugel (Oct. 27, 1993). In order for the 60 day notice requirements of the NFMA regulations to fulfill its purpose, the public must have a meaningful opportunity to comment on the proposal.</p>	SEAC-31	<p>Refer to response to ADFG-5. Additionally, the EIS demonstrates that expected soil disturbance is below the 15 percent level of reduction in inherent soil productivity (FSM 2554.03; see Chapter 4, Table 4.-2). Further, all timber harvest within the Project Area, including that of forested wetlands, is limited to acres determined to be suitable for such harvest. The identification of suitable acres includes, as one criteria, the assurance that adequate restocking will occur within 5 years of final harvest (this is an NFMA requirement). The fact that growth rates may be slower on forested wetland sites does not make these sites unsuitable for harvest provided that adequate restocking can be achieved. The EIS discusses effects to forested wetlands such as possible temporary increases in soil moisture until vegetation is reestablished. There is no evidence or analysis showing that irreversible damage to forested wetland functions will occur.</p>



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SEAC-33  
(cont.)

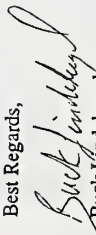
NEPA's 45 day comment period is a minimum time period and should be extended to 60 days whenever the agency proposes cutting units in excess of the 100 acre size limitation applicable to the Tongass. The Forest Service's failure to correct the comment period for this DEIS is arbitrary and an abuse of authority.

Comments relating to compliance with the state Forest Practices Act.

SEAC-34

The DEIS incorrectly claims that proposed clearcutting operations are consistent "to the maximum extent possible" with the state Forest Practices Act. For instance, the amount of logging and roading proposed on steep slopes and unstable slopes is inconsistent with AS 41.17.060(b)(5), which directs that "significant adverse effects of soil erosion and mass wasting on water quality and fish habitat shall be prevented or minimized." Another relevant provision requires "allowances [to] be made for important fish and wildlife habitat." AS 41.17.060(c)(7). However, no findings are made showing that proposed cutting in riparian areas between 100 and 300 feet from the stream is "consistent with the maintenance of important fish and wildlife habitat." See AS 41.17.118(a)(2)(B).

Best Regards,

  
Buck Lindekugel  
Staff Attorney

enclosures: Appeal No. 93-10-00-0011 and exhibits; Intervention Comments submitted by SCLDF on Nov. 18, 1993 and exhibits.

## Responses to the Southeast Alaska Conservation Council

SEAC-32

Comment noted.

SEAC-33

Comment noted. Refer to response to SEAC-1.

SEAC-34

Refer to responses to ADFG-5, ADFG-33, ADFG-34, ADFG-36, ADFG-37, SEAC-7, and SEAC-8.

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# GREENPEACE

Alaska Forests Campaign Box 6001 Sika, Ak 99835 907-747-8996

November 24, 1993

David Rittenhouse, Forest Supervisor  
 USDA Forest Service  
 The Federal Building  
 Ketchikan, Ak 99901

Subj: Polk Inlet DEIS Comments

Dear Mr. Rittenhouse:

These are our comments on the Polk Inlet Draft Environmental Impact Statement (DEIS). I cannot express how deeply disappointed I am in the lack of fairness consistently afforded to the public during planning processes in the Ketchikan Area. The Polk Inlet DEIS continues in this tradition, which is all too well established by a long string of recent plans. The Purpose and Need for the project was established outside of the NEPA process, hidden from public scrutiny and shielded from public comment. It has been applied inflexibly, resulting in a range of alternatives of, for all practical purposes, zero. Reasonable alternatives Greenpeace and other scoping participants desire to have fully evaluated have been ignored because they would not satisfy in-whole the defined Purpose and Need. See DEIS 2-6, Alternative B.

Continuing this tradition of unfairness, public comment period was contemporaneous with two other plans: Control Lake and North Revilla. Significantly, these three plans followed very closely on the heels of the review period of another major plan, Central Prince of Wales. This practice ignores the obvious inability of the public to defend its interests in the face of such an onslaught of plans, especially when EIS's are complex exceed (of necessity) the NEPA's recommended maximum of 150 pages. When I called this inequity to your attention at our mid-October meeting and asked you to modify the schedule to allow sequential review of the plans, all you said was "noted." Two later calls to your office did not result in any more of a response that that. Perhaps you think you have satisfied the letter of the law with the absurd schedule, but you certainly have violated the public trust and at least the spirit of the law in the process.

See responses to ADFG-3 and SEAC-9.

The public comment period for the Polk Inlet DEIS ran from October 1, 1993 to November 24, 1993. This represents approximately 10 days longer than the minimum 45-day period required by the Council on Environmental Quality regulations (40 CFR Part 1506.10). Comments continued to be received up through December 30, 1993 and form letters were received into 1994. A total of 45 comment letters were received. These included 45 letters containing 433 comments and approximately 360 form letters. In addition, hearing testimony was taken at seven communities. All comments received have been accepted and analyzed in the preparation of this FEIS.

GRP-1

GRP-2

BY FAX TO 225-5626

GRP-1

GRP-2

## Comments of Greenpeace

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GRP-3

Saying the above is difficult for me in view of the good work you have done in initiating the karst study; however, important though it is, the karst study pales in significance when compared to the far broader ecological modifications of these logging plans. You are seriously jeopardizing the long-term ecological integrity of the south Tongass by plunging ahead blindly with all recent plans, shunning the information that a review of all reasonable alternatives would provide, and seemingly taking every step that you can to put the public at a disadvantage in commenting on the projects. The ecosystem is not all that you jeopardize however. Plan by plan, acting in the way that you are, you keep adding cards to a house of cards. Ketchikan Area planning blatantly violates NEPA and other laws, and a legal action that prevails on one plan will imperil all. Greenpeace and other organizations and individuals have warned you and your planning teams about this repeatedly; we have acted responsibly and have done all that we can in an attempt to make the planning process work. We only wish that you would take this advice rather than force the planning process to a meltdown.

We ask that the Polk Inlet DEIS be completely redone, taking to heart the needs to establish the Purpose and Need for projects through a public process and to incorporate a broad range of alternatives in plans, among other procedural reforms. These planning reforms have been requested every opportunity in various plans over the past few years. The reworking that is necessary for the Polk Inlet plan is so substantial that it is unlikely that a supplement to the DEIS would be up to the task.

### THE RANGE OF ALTERNATIVES IS INADEQUATE

The range of alternatives in the Polk Inlet plan is 124 to 127 million board feet (mbbf). In at least two places the DEIS misleads the casual reader about this narrow range. "Based on the information in this EIS, the Forest Supervisor will decide whether and when to make timber available for harvest and how much to make available." See DEIS 1-2, emphasis added. Given its location on the second page of the EIS, the statement is very prominent. Another example is, "(f)orest Supervisor decisions will include: The timber volume to make available under the contract from this Project Area;". See DEIS 1-11.

Neither of these statements from the DEIS are true for the Polk Inlet planning process. NEPA precludes a deciding officer from selecting an alternative that was not fully evaluated. Since the only action alternatives considered by the DEIS would yield the same volume (with a variation of essentially nil), you have shut out any opportunity to decide on a different volume. The decision on how much timber to make available has in fact for all practical purposes already been made, and it was made outside of the NEPA process ("extra-NEPA"), as documented on pages 1-7 and 1-8 of the DEIS. The DEIS makes clear in many places that the satisfaction of this extra-NEPA decision is strictly enforced. To make important planning

## Responses to Greenpeace

GRP-3

The Polk Inlet FEIS provides a full and fair discussion of significant environmental impacts and informs the decision-maker and the public of the reasonable alternatives which avoid or minimize adverse impacts or enhance the quality of the human environment. The Council on Environmental Quality regulations [40 CFR 1502.14(a)] state that all agencies shall "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which have been eliminated from detailed study, briefly discuss the reasons for their having been eliminated." The Forest Service believes each alternative (except the no-action alternatives) must meet the purpose and need to be considered "reasonable." Also see responses to ADFG-3 and SEAC-9.

Comment noted. See responses to ADFG-3 and SEAC-9.

GRP-4



decisions in this way is not fair and is a violation of NEPA, and it is untruthful to make characterizations in the EIS such as those cited in the paragraph above.

GRP-4  
(cont.)

A recent order by Judge Robert Parker granting a preliminary injunction supports our conclusion that this violates NEPA. See Sierra Club v. Espy, 1993 WL 172660 (E.D. Tex). He concludes that, "the Forest Service had first established timber production goals and then formulated its 'alternatives' guaranteeing that the Service planners would reach these goals," and that this "does not constitute a consideration of a broad range of alternatives as contemplated by 36 CFR Sec 219.12(f)."

The judge speaks directly to planning practices in your Area, and his decision has already been called to your attention through recent comments and appeals on other plans in the Ketchikan Area. Although your agency has appealed Judge Parker's order, his wording is very firm. Does this not indicate to you that it is appropriate, especially considering significant public pressure to do so, to broaden the range of alternatives in the Polk Inlet EIS? Why gamble by doing otherwise? To do otherwise is to take an obvious risk in the legal forum as well as with public funds that are consumed in the planning process.

**INAPPROPRIATE FACTORS ARE DRIVING THE POLK INLET PLANNING PROCESS, AND FACTORS WHICH SHOULD BE INCLUDED ARE LEFT OUT.**

GRP-5

**1. Decisions & Planning Are Based on Faulty Contract Analysis.**

In its project EIS's, including Polk Inlet, the Ketchikan Area claims that its decision (the extra-NEPA one) allotting timber targets to specific projects is based on Forest Service obligations under the KPC 50-year contract. It is claimed that KPC is entitled to 8.25 billion board feet (mmmbf) of timber, of which 2.6 mmmbf remains to be provided by the year 2004, requiring an average annual cut of 205 mmmbf.

This claim has no basis in the contract! The Ketchikan Area has failed to analyze the contract, and as a result has failed to act on its true requirements and limits. First, the 8.5 mmmbf is not an entitlement for KPC, but is stated in the contract to be an "estimate" of the amount of timber available in the contract area. The 8.5 mmmbf is clearly described in the contract to be a lid on the amount of timber to be provided.

There are two ceilings that control how much timber, up to the 8.25 mmmbf, the mill may actually obtain and the rate at which it may be cut. One is that the maximum amount of timber that may be cut is 192.5 mmmbf per year, which is significantly less than the 205 mmmbf average cut the Forest Service is trying to accommodate. The other ceiling is that the Forest Service is obligated to provide only enough timber to operate at full capacity, which the contract defines

GRP-5

The timber supply requirement of the KPC long-term contract has not been misinterpreted. The KPC long-term contract uses the figure 1,500,000,000 cubic feet as the total amount to be supplied to KPC. [The contract uses a conversion ratio of 5.5 board feet for each cubic foot (B0.1), making the total, in board feet, 8.25 billion board feet (BBF).] Under B0.1, the Forest Service is "not obligated to make available for cutting ... more timber than a total of 1,500,000,000 cubic feet of material from all areas, all as set forth in said contract, said contract being subject to all other conditions and reservations stated therein." Also, under B0.1, the Forest Service must determine that this total quantity is available within the contract area. The other reference to 1.5 billion cubic feet is under B0.3 (Description of Timber): "The estimated amount to be cut ... is 1,500,000,000 cubic feet ... , more or less." This amount is thus given as an estimate, or as the approximate amount to be supplied under the contract.

The Forest Service has an obligation to ensure a timber supply over the life of the contract. Using the total supply requirement of the contract (8.25 billion board feet), the FEIS (Chapter 1) estimates the amount remaining to be supplied to KPC as "approximately 205 MMBF per year," based on the amount harvested by KPC so far. This estimate of annual supply is used in Appendix A to schedule timber offerings over the life of the contract to ensure that sufficient timber volume will be available to KPC. In any given year, the purchaser may harvest more or less than this, subject to a total harvest limit within each 5-year period (Section B0.52).

The issue of KPC's current mill capacity is beyond the scope of the Polk Inlet EIS. Additional capacity beyond that specified in the contract (300 to 525 short tons per day) has no bearing on the calculation of remaining contract timber supply obligations, or the annual amount to supply. These amounts were based on the timber volume originally projected under the contract.

It should also be noted that the Polk Inlet EIS volume can also contribute to the Ketchikan Area Independent Timber Sale Program. Furthermore, factors such as the shortfall in the 1989-94 Operating Period volume and the selection of an alternative producing approximately 260 MMBF instead of 290 MMBF in the Central Prince of Wales Project Record of Decision were not specifically accounted for in determining the Polk Inlet Project purpose and need. This indicates that the Polk Inlet Project purpose and need of 125 MMBF is still appropriate and should not be lowered.

## Comments of Greenpeace

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(cont.)

as 525 tons of pulp per day. The contract allows the mill to be expanded to attain that capacity, but not beyond it.

KPC has been cutting more timber than the contract allows for many years. The 192.5 mmbf annual limitation has been exceeded by a total of 108 mmbf by cutting conducted in 1973, 1974, 1980, 1989 and 1990. (We obtained this information from the North Revilla planning record, and it is notable in its absence in any DEIS or FEIS yet produced.) In addition to this 108 mmbf, KPC has cut an excessive amount of timber because the capacity of the mill has for decades greatly exceeded the 525 ton per day capacity limit.

Therefore, rather than designing all alternatives in the Polk Inlet DEIS to contribute to providing the erroneously determined 205 mmbf per year "magic number," the EIS should have had alternatives that would, variously, (1) reduce the cut sufficiently to correct, by the termination date, for past (and at present, continuing) excessive cutting, or (2) provide the lesser of 192.5 mmbf per year or enough to operate a 525 ton per day capacity mill. There is absolutely no contractual basis for any of the action alternatives that were presented in the DEIS, and they should be discarded.

It may seem at first look that the Tongass Timber Reform Act's (the Reform Act) seek-to-meet-market-demand language allows the contract's limitations to be exceeded; however, we disagree and wish to lay such an argument to rest now. The Reform Act has a section which specifically addresses modifications to the contract, but a modification to allow exceeding the capacity and annual cutting-rate limitations of the contract is not one of them. To the contrary, while logging by KPC contributes to the satisfaction of market demand, if a volume of timber beyond what the contract can provide is needed by KPC to meet that demand, it need not (and in fact cannot without specific direction for such a contract modification) come out of the long term sale area. It would have to be provided through independent sales, subject of course to that this would be consistent with providing for the sustained yield of all renewable resources is satisfied. See sections 301 and 101 of the Reform Act.

We request that you direct the planning team to thoroughly analyze the contract, present a detailed discussion of the analysis in the EIS, redesign the alternatives to address contract limitations retroactively, and correct all references to 'contract requirements' in the EIS (there are many).

See sections B.01, .03, .031 and .052 of the KPC contract.

GRP-6

2. TLMP IS OVER EMPHASIZED, AND THE REFORM ACT IS NEGLECTED.

TLMP has not been amended since before passage of the Tongass Timber Reform Act. The Act requires significant reforms in planning and decision-making on the Tongass, and the existing TLMP is inconsistent with the reforms. The Act became effective shortly after its passage, and its implementation is not optional or tied to

## Responses to Greenpeace

This comment is beyond the scope of this project-level EIS.

GRP-6

Greenpeace -- Nov 23, 1993 -- Polk Inlet DEIS Comments.

P. 5

GRP-6  
(cont.)

adoption of a TLMP Revision. Management of the Tongass must change to comply with this law, but it cannot until a ROD for a properly drafted Revision is signed. For the time being, in the absence of a timely Revision, TLMP is dead! Therefore, plans such as Polk Inlet must tier directly to the Reform Act.

One effect the Reform Act has on Tongass planning (at all levels) is to negate TLMP's moderate and intense Land Use Designations (LUD's III and IV), at least as they exist in the current TLMP. In particular, section 101 of the Reform Act requires that the sustained yield of all renewable resources be protected. The definition of LUD's III and IV and the way the existence of on-the-ground instances of these LUD's (especially LUD IV) prejudice alternative development and planning decisions is inconsistent with section 101 of the Reform Act. Timber production under LUD's III and IV is improperly given primacy in project plan preparation and final decision-making over the sustained yield of other resources. This is especially a problem and a conflict with the Reform Act for subsistence resources, whose site specific utilization (in addition to the needs of the resource itself) conflicts directly with the management implications of these two LUD's.

Another effect of the Reform Act is to negate TLMP's Desired Future Condition (DFC). The Forest Service must provide for the sustained yield of all renewable resources, and since the DFC was not selected with this accomplishment in mind, using the DFC as a primary deciding factor in planning direction is improper. The alternatives in the EIS should present several alternative DFC's that satisfy the Reform Act and other laws; the existing alternatives are subtle variations on only one DFC.

The existing TLMP and even the work done to date on the TLMP Revision draft are hopelessly outdated by recent scientific information, for example on karst, goshawk territories and streamside buffers. The information which went into PACFISH is more advanced than what was used in establishing 100 foot buffers in the Reform Act, and streamside buffers on the Tongass have proven not to be the panacea suggested in the DEIS. There have been numerous problems with unmarked or mismatched buffers and blowdown. See Issue 2 for each of the action alternatives, for example on DEIS page 2-12. TLMP is dead, and project plans must eclipse it by applying ecosystem management principles, as guided by available scientific information and the direction of law, with thorough NEPA validation.

GRP-7

3. Improper, Extra-NEPA Reform Act Implementations Drive the Planning Process

While some key Reform Act requirements have been ignored as discussed above, other provisions of the Act have been improperly interpreted and their implementation has been done outside of the NEPA process. The unilateral contract modifications and changes made to the Forest Service Handbook both fall into this category. An example is that while the Act intended to end the accumulation of

The contract modifications directed by the TTRA and accomplished by the Forest Service were specific legislative requirements and not subject to the NEPA process under CEQ regulations (40 CFR 1500). This comment is beyond the scope of this project-level EIS.

GRP-7



## Comments of Greenpeace

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GRP-7  
(cont.)

timber backlogs by the long term contract holders by requiring that each timber offering be cut within three years, the Forest Service has instead institutionalized an automatic three year backlog. This not only misinterprets the Act's three year provision, it offers timber differently under the long term contracts than with independent sales, which is something the Act prohibits.

There are several other important Reform Act requirements which have been improperly implemented, and we refer you to our recent scoping comments on the Control Lake project and the recent Tongass Conservation Society appeal of the North Revilla plan (on which we assisted) for specifics. The point is that an EIS should have been prepared for changes made to the long term contracts and the Forest Service Handbook as a result of the Reform Act. Since the NEPA review has not been done, the contract changes and new regulations have no validity, and project EIS's such as Polk Inlet must tier directly to the Reform Act and provide their own NEPA review.

GRP-8

4. Too Much Timber is Provided Even from the Forest Service Point of View.

On page 1-7 it is stated that the desired timber supply is 820 mmmbf. We disagree with this determination for several reasons, as stated above. We note that the Polk Inlet plan would contribute to providing 930 mmmbf, as shown with the pie chart on page 1-8, not the 820 stated on the previous page. This demonstrates the serious errors that can occur as a result of planning that is done outside of the NEPA process. We apparently have in this case a succession of decisions allocating timber on a Ketchikan Area scale, poorly documented and unsupported by any NEPA or other public review. Even the Forest Service itself is confused over what the master plan really is.

GRP-9

CUMULATIVE AND TOTAL EFFECTS ARE NOT ADEQUATELY CONSIDERED.

Cumulative effects are considered only issue by issue in the Polk Inlet DEIS. There is need for such an issue by issue discussion; however, by their nature cumulative effects have not truly been considered unless impacts from all issue viewpoints are considered together. There should be a section at the end of Chapter 4 (Environmental Consequences) that analyzes as a whole the overall impacts from each alternative. The discussion should consider direct, indirect and cumulative impacts. This is necessary to assure that the final evaluation is systematic and interdisciplinary, and that the public and the decision-maker are fully aware of the relative weightings that the planning team considers to be appropriate among the issues considered and impacts identified.

GRP-10

With respect to cumulative impacts, a couple of issues need special attention. The EIS should have a map of Prince of Wales Island showing all past logging and roading on state, private and federal land. Another map showing the anticipated, end-of-rotation

## Responses to Greenpeace

GRP-8

The referenced 820 MMBF is for a 4-year period (the 1993 logging season plus a 3-year timber supply) and is still valid. The referenced pie chart displays 820 MMBF, plus attempts to account for other volume offered or potentially available to KPC, but is not tied to a 4-year period. Thus, the pie chart attempts to account for all current and projected volume potentially available to KPC including volume from outside the 4 identified project areas.

GRP-9

The analysis that is being referred to (i.e., considering the impacts from all issue viewpoints together in one section) is provided in Chapter 2, which also provides a comparison of the environmental impacts of the alternatives, issue by issue.

GRP-10

The cumulative effects analysis for the Polk Inlet Project Area displayed in Chapters 2 and 4 has been revised and strengthened in many areas. The requested map for all of Prince of Wales Island is considered too expensive to produce and unnecessary for a project-level EIS. Relevant data and maps for cumulative impact assessment are included in the FEIS. Also, refer to response to ADFG-33 regarding cumulative watershed impact analysis.

GRP-10  
(cont.)

future condition should also be provided. The maps should indicate the amounts of volume classes 5, 6 and 7 which will remain (as three separate and distinct classes), and should identify Habitat Conservation Areas and other wildlife retention. It is highly important that all logging in and near the project area, regardless of land ownership, be included in the analysis of cumulative impacts. Also a Cumulative Watershed Impact Analysis is required but has not been done.

**FISH AND WILDLIFE WILL BE UNACCEPTABLY IMPACTED AND IMPACTS ARE INCOMPLETELY EVALUATED.**

**A. Cumulative Impacts on Wildlife and Inappropriate Use of Wildlife Models.**

The discussion of the Brown creeper, a management indicator species, at DEIS 3-100 shows significant impacts from previous logging. Table 3-40 shows that habitat capability has been reduced by 56%, averaged over five WAA's. This average masks severe estimated declines in three of the WAA's of 78%, 80% and 91%. The table should highlight this, and it should be addressed in the text. The same procedure should be followed in Chapter 3 for other species.

Cumulative impacts to the brown creeper and several other indicator species are displayed in Table 4-54. With few exceptions, the impacts shown for the end of the rotation (the year 2054) are significant and unacceptable under principals "sound management" (see ANILCA section 810 for the implications of this) and the maintenance of ecosystem health and vitality described in Appendix A of Region 10's Ecosystem Management Strategy (1992). It must be remembered that these are indicator species, and that impacts to them, especially when so many are so significantly affected, are representative of impacts throughout the ecosystem and involving a much larger number of species. We summarize the impacts here in a different way than Table 4-54 because of the extreme importance of this issue:

INDICATOR SPECIES	TOTAL PREDICTED REDUCTION, 1954-2054	TOTAL PREDICTED REDUCTION, PRESENT-2054
Canada Goose	90	39
Brown Creeper	86	31
Hairy W. pecker	83	42
RB Sapsucker	71	54
Marten	61	42
Deer	60	40
Wolf	53	33
Eagle	30	1

GRP-11

GRP-11

As shown in Figure 3-12, WAA boundaries do not correspond well with Project Area boundaries for the Polk Inlet Project Area. In fact, none of the five WAA's involved are entirely within the Project Area. Table 3-40 and similar tables in this section, present habitat capabilities for the portions of the WAA's within the Project Area only; thus, it would be misleading to give individual percent reductions for each WAA in these tables. For example, the 91% reduction referred to is for WAA 1332 which has only 21% of its area within the Project Area. Percent changes are provided for the Project Area.

The comment regarding Table 4-54, is confusing because the information requested is clearly shown in the table. Changes up through the present are shown in the row titled "Alt. 1a 1993." Changes up through the full implementation of the 1989-94 EIS are shown in the row titled "Alt. 1 1994." The row titled "Alt. 2 1997" presents changes up through the full implementation of the Polk Inlet Project; as noted in the footnote, Alt. 2 is used to represent all action alternatives.

Finally, we recognize the shortcomings of the wildlife models; these were summarized at the beginning of the Management Indicator Species (MIS) section under Wildlife in Chapter 3. However, we strongly disagree that the models have been misused. Your concerns regarding the significance of long-term reductions in habitat capability for MIS are noted.

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GRP-11  
(cont.)

It is important to note that these estimates from the DEIS do not reflect effects due to reductions in patch size or increases in road density (this fact is well hidden in a footnote to Table 4-54), making the figures unconservative.

Also there is ambiguity in Table 4-54, in that what is really needed is several such tables, one for each alternative; it is especially important that separate tables be presented for Alternatives 1 and 1a, since these can be used as comparative baselines. It is impossible to tell from Table 4-54 how much of the impact expected in the year 2054 is due to logging activities conducted before present, and providing multiple tables make it possible to determine that. It appears significant, however, that a majority of the total impact to many species, relative to populations in 1954, will occur "after present," as shown in the table I have provided above. For the now common subsistence species, deer, 2/3 of the eventual total population reduction (a further 40% reduction leading to an eventual 60% reduction) is predicted to occur after present. Similarly it is predicted that: for the Hairy woodpecker a further reduction of 42% will lead to a total reduction of 83%; for the Alexander archipelago wolf, 33% and 53%; and for the Red bellied sapsucker 54% and 71%. That the Forest Service would do anything that would contribute further to these excessive losses of indicator species is absolutely shocking. This is not sound management, it is not "caring for the land," it is not "serving the people."

It must be pointed out that wildlife models such as used to make the predictions discussed here are well known to be inaccurate for predicting population sizes -- the recommended use is only for relative comparisons of alternatives. Also, the models have not been field verified (see Ecosystem Management Strategy, Region-10, September 1992), leaving in question even their applicability for making comparisons. Since the Forest Service has found it tempting to misuse these models, as in the brown creeper example and in Table 4-54, a significant, conservative factor of safety should be applied to the predictions for population sizes and percentage declines.

### B. Failure to Designate Retention and Habitat Conservation Areas.

The Polk Inlet plan apparently designates no wildlife retention or Habitat Conservation Areas (HCA). None are located on the maps, and there are no references on these subjects in the index or that have been found in the text. It is stated, "(p)reviously mapped old-growth retention and extended rotation areas are consequently considered as part of the tentatively suitable and available timber base, unless otherwise excluded." See DEIS 2-6. Previously designated retention should continue to be mapped since it was intended to be permanent. HCA's should be designated and mapped through a systematic process well documented in the EIS. It is apparent that for the actions alternatives some blocks will be "left over," but there is no indication that the end result is well planned or is more than an artifact of the drive to meet the timber target.

GRP-12

## Responses to Greenpeace

GRP-12

The treatment of old-growth retention and Habitat Conservation Areas has been revised in the FEIS.



GRP-12  
(cont.)

Significantly: retention, Habitat Conservation Area, ecosystem management and viable populations do not appear in the DEIS index!

GRP-13

C. The Alternatives Fail to Achieve Proportionality.

The proportionality language in the Reform Act is there primarily to assure that prime wildlife habitat is not unduly decimated by highgrading. Maintenance of proportionality is therefore of great importance to the supporters of Greenpeace. Table 3-26 shows that both Management Areas in the Polk Inlet project are out of compliance with the proportionality requirement. This has apparently resulted from unit expansion in the 1989-94 Longterm Sale plan, and the departures from proportionality are continued forward by the Polk Inlet alternatives. We request that all the existing alternatives be dropped (they implement neither requirements of the contracts nor or proportionality) and that the plan be redrafted with alternatives that bring the project area into compliance with proportionality.

Also, Table 3-26 presents proportionality but is not explained, and is probably not understandable to the typical citizen. A detailed explanation is needed of the relationship of proportionality to wildlife habitat and of what the numbers mean.

GRP-14

D. An Ecosystem Approach is Really Not Taken in Planning.

In the Affected Environment chapter, the forest plant community series present in the project area are listed. See 3-49 to 52. In the Environmental Consequences chapter, however, the forested plant series receive scant mention in a two paragraph section (page 4-51) and in one table (Table 4-25). The table addresses only sample plots, not the project area as a whole. The information given does not begin to tell the reader how this project will modify the base of the ecosystem, in either the direct or cumulative sense, much less begin to explain what the ecological implications of the modification are. This is failing of the Polk Inlet plan at the most basic of ecological levels.

POINT BY POINT COMMENTS AND QUESTIONS:

GRP-15

Page 1-10, top three paragraphs: "More than half of the forest was anticipated to remain in a basically unmodified state." This should have been expressed in terms of how much of the CFL and how much of each VCU will be left in an unmodified state (expressed in percent of acres). Also, the DFC in TLMP must be considered invalid because of new direction provided by the Reform Act.

In the second paragraph, tiering to the TLMP revision is improper since the plan has not been approved and is the subject of considerable controversy. Again, expressing impacts ("modification") in terms of the forest as a whole is an extremely misleading perspective; what is most important is the impact on the habitats and other features (such as karst) which are most directly affected.

See response to ADFG-9.

GRP-13

The referenced table in Chapter 4 describes the plant series affected by the various alternatives. The plant series distribution within the entire Project Area is described in Chapter 3. No quantitative inventory of plant series distribution exists within the entire Project Area. The plant association classification system for the Ketchikan Area is just recently becoming understood and described. Plant association represents a stand level variable under ecosystem management. As such, plant association information collected during field verification has been used to guide the selection of mitigation measures and the development of integrated silvicultural prescriptions for potential harvest units.

GRP-14

GRP-15

Most of this comment is beyond the scope of a project-level EIS. However, please note that the purpose of this section is not to provide a detailed analysis of long-term changes, but to provide a summary of the management emphasis or desired future condition defined by TLMP and the TLMP Draft Revision. Long-term effects of implementation are properly analyzed in Chapter 4. Also, please note that, as described on the page following the referenced page, this EIS tiers to the TLMP EIS and proposes management consistent with the preferred alternative in the TLMP Draft Revision, but does not tier to it.

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GRP-15  
(cont.)

This section of the EIS is extremely vague and misleading. The impacts expressed in the third paragraph of page 1-10 are unacceptable -- 86% modification of the entire project area is intended. This is NOT a desirable future condition, and the range of alternatives should include other possible DFC's.

GRP-16

Pages 1-10 & 11 - "Decision-making Process:" The 1st paragraph of this section ignores the role of the Reform Act and its implementation. In the second paragraph a listing of the last three RPA plans should be included along with a reference as to whether the NEPA process was completed for each -- we believe you will be surprised by what you discover in this research. In the subsections on regional and forest level planning, fail to complete amendments and NEPA review of the Alaska Regional Guide and TLMP after passage of the Reform Act needs to be noted. We take exception with the last sentence of the third paragraph of page 1-11. While it is true that the TLMP Revision cannot be used until its ROD is signed, the current TLMP can be applied only where it is not inconsistent with the Reform Act -- and its application must be carefully evaluated in project level EIS's. The same hold true for the 4th and 5th paragraphs, which mention tiering to or implementing the current TLMP.

The first sentence of the third paragraph is incorrect in saying that TLMP was "amended" in February 1991. The plan is not amended until the ROD is signed.

GRP-17

**There are Serious Problems with the Maps:** The maps fail as tools to judging project impacts because they do not depict past logging on state and private lands inside or near the project area or on Forest Service land near the project area. At a minimum, each adjacent WAA should be shown in its totality on the maps. It is important that the maps have contour lines. While it is laudable that the maps distinguish between high and low volume old growth in cutting units, the public really needs to see all four volume classes. With the need for contour lines and depiction of all volume classes, the maps need to be larger.

GRP-18

**The Index and Glossary Need Improvement:** Many references are notable in their absence from the index, and as a result, my "hit rate" on finding topics in the index has been extremely low. The index needs to be far more complete. The indentation of multi-line entries is very welcome since it makes the index more readable, but it would be a good idea to also break long entries down into sublevels, each with its with subtitle, to make the index more user-friendly. Material in the appendices to the EIS should be indexed in the main index. It is especially important that in the FEIS the Response-to-Comments appendix be well indexed.

The glossary should contain all technical terms used in the EIS. Notable in their absence and not understood by the typical citizen are terms such as: suitable, tentatively suitable, isolated, difficult, normal, etc. These technical terms have specific meanings that need to be explained.

## Responses to Greenpeace

The TLMP was amended in February 1991 as a result of the Tongass Timber Reform Act.

An additional large-scale map of the Project Area containing more detailed information along with the project unit pool and the selected alternative has been included in the FEIS in response to comments. The individual 11" x 17" maps of each alternative are still included.

These comments regarding the index and glossary have been considered and these sections have been improved as a result.

GRP-16

GRP-17

GRP-18

GRP-19

**A Better Response-to-Comments Section is Needed:** When the Polk Inlet plan is ready to be issued as an FEIS (and to reiterate, we feel for many reasons that it must be redrafted or supplemented), a much better job should be done of providing responses to public and agency comments. The response appendices in the CPOW and North Revilla FEIS's were poorly done. Typically too many comments were lumped into a point for response. Snippets quoted from one or a few comments to define an issue were often not representative of all of the comments in the grouping. Major points made in comments in a grouping were often ignored. The lack of an index sorted by commenter serial number renders extremely difficult the task of trying to determine who made a particular comment. In the North Revilla FEIS, the issue number written in the margins of comment letters is not the same numbering system that was used in the response-to-comments appendix in the FEIS, and no cross-reference was available (I inquired). This makes it impossible to find the original issue-specific comments in particular letters (in the planning record) to which the planning team was responding.

I also suggest adding a step to the comment response process. As soon as the planning team has completed its analysis of comments and its responses, and before commencing work on finalizing the EIS, a copy of the responses as they are proposed to appear in the FEIS, should be sent to all commenters. The commenters should be asked for feedback on whether their comments appear to have been understood correctly by the planning team and whether each comment made has been (1) addressed and (2) fairly represented in the grouping in which it was placed.

## CONCLUSION

GRP-20

Mr. Rittenhouse, these comments are not what they should be. They are incomplete and not in the final form I would like. The reason for is the unreasonable workload imposed by your scheduling of review periods for three plans contemporaneously, and closely following a fourth plan. Your schedule unreasonably harms our ability to defend the interests of our supporters. We therefore reserve the right to raise points not covered in these comments later in the planning process, ncluding on appeal of an FEIS/ROD, and we incorporate by reference all previous comments we have made concerning project plans on the Ketchikan Area.

We request that you not schedule simultaneous review periods for projects any more, and that you determine appropriate "windows" when the public is best able to comment. The window used in the case is, we believe, a good one; the problem is that more than on plan took advantage of it.

GRP-21

These comments point out the need, with several supporting arguments, for redrafting or supplementing the Draft EIS. We request

GRP-19

Individual comment responses have been prepared for the Polk Inlet FEIS. As can be seen, these are printed alongside the individual comment letters. Thus, grouping comments into representative groups has not had to be conducted.

GRP-20

Comment noted. Also see response to GRP-2.

GRP-21

See response to GRP-3. The Forest Service is unaware of any substantial change in the proposed action or other circumstances that would necessitate the preparation of a supplemental DEIS.



## Comments of Greenpeace

Greenpeace -- Nov 23, 1993 -- Polk Inlet DEIS Comments.

P. 12

GRP-21 } again that you order such a remake of the Draft EIS, and that an  
(cont.) } FEIS not be prepared at this time.

I am sending these comments to you by FAX on the deadline date,  
and am submitting hard copy by mail.

Sincerely,



Larry Edwards  
Alaska Forests Campaigner

Responses to Greenpeace



Senior, Mt. McKinley  
Aunt Adams

# SIERRA CLUB LEGAL DEFENSE FUND, INC.

The Law Firm for the Environmental Movement

325 4th Street Juneau, Alaska 99801 (907) 586-2751 FAX (907) 463-5891

November 24, 1993

Forest Supervisor  
Ketchikan Area  
Tongass National Forest  
Attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK 99901

Dear Forest Supervisor:

The Sierra Club Legal Defense Fund submits these comments on the Polk Inlet draft EIS on behalf of its client The Wilderness Society.

The Wilderness Society is a party to the ongoing litigation in The Wildlife Society, et al. v. Barton, No. J93-001 Civil (D. Alaska 1993). That case alleges that the timber-type maps being used to calculate proportions under section 301(c)(2) of the Tongass Timber Reform Act are too inaccurate to be used for this purpose and that the Forest Service is improperly calculating proportions of acres rather than of volume as required by the plain language of the statute. The arguments raised in that litigation apply equally to the Polk Inlet sale, because the Forest Service is using the same methodology for all the sales. The Wilderness Society hereby incorporates by reference the Plaintiffs' Opening Brief (filed Sept. 24, 1993) and the Plaintiffs' Reply Brief (filed Nov. 12, 1993), together with all exhibits attached to those briefs, in that litigation. These documents are in the possession of the Forest Service, the Office of General Counsel of the USDA in Juneau, and the U.S. Justice Department in Anchorage. Because these documents are voluminous and already in the possession of the Forest Service, there is no need to submit extra copies with this letter. However, if you would like extra copies, we will gladly send them to you at your request.

With regard to the Polk Inlet sale, the draft EIS demonstrates violations of section 301(c)(2) in all of the action alternatives for Management Area K17 and nearly all of them in Management Area K18. It appears that violations will also result from logging under the 1989-94

SCF-1

Refer to response to ADFG-6 regarding the accuracy of timber type maps.

Regarding the use of acres rather than volume for calculating proportionality refer to the following. Volume classes are defined in TLMP and supporting documents by broad ranges of average standing volume per acre. Using acres comprising each volume class to measure compliance with the proportionality requirements of the TTRA thus provides a measure of estimated volume proportion (average or range of volume per acre times number of acres equals estimated volume). The TTRA, as indicated by the GAO audit of Forest Service implementation, provides for combining volume classes 6 and 7 for purposes of measuring the single proportion which these classes comprise of the total timber base in a Management Area and the portion of that area that is harvested. The measure of compliance under the statute is only this proportion, not the precise or total volume in each class. Acres in each volume class can be readily and objectively measured from maps, avoiding the subjectivity and imprecision inherent in sampling methods used to estimate standing timber volumes in the various areas. It is not at all clear how using acres rather than estimated volume makes any significant difference in proportional harvest for the Polk Inlet Project.

SCF-2

Refer to response to ADFG-9 and ADFG-10.

SCF-1

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Washington, D.C.

SCF-2

## Comments of the Sierra Club Legal Defense Fund

November 24, 1993  
Page 2

SCF-2  
(cont.)

record of decision. Thus, you must correct the units that have been offered under the 1989-94 record of decision to make them comply with the Act, and also correct the alternatives in the Polk Inlet draft EIS so that they also comply. The Forest Service may not highgrade now and plan to correct it by "lowgrading" later. This is precisely what Congress intended to prohibit. There is no guarantee that the Forest Service will be able to offer timber under a logging plan that would correct the violations through any future planning process, or that KPC would accept an offering that focuses on low-volume timber in order to correct past highgrading.

SCF-3

Moreover, the unit cards included in the draft EIS reveal that the actual highgrading is apparently even worse than the highgrading detected by the timber-type maps. It is our understanding that the contractors preparing the EIS performed one field stand exam for every ten acres in the proposed harvest units. Please verify that this is true. It appears from these field stand exams that many of the proposed harvest units have an average net inventory volume that would place the unit in volume class 6 or 7, while the timber-type maps portray them as volume class 4 or 5. This information suggests substantial highgrading in violation of section 301(c)(2).

SCF-4

In short, the Forest Service must: (1) use reliable information -- rather than the timber-type maps -- to calculate the proportions under section 301(c)(2); (2) calculate proportions of timber volume rather than of acres; and (3) correct the violations of section 301(c)(2) that are reported in the draft EIS and shown to be even worse by the field stand exams in the harvest units.

Thank you for your attention to these comments.

Sincerely,



Thomas S. Waldo

## Responses to the Sierra Club Legal Defense Fund

SCF-3

First, it is important to note that the volumes indicated on the unit cards and generally throughout the EIS represent net plus utility volumes. The volume classes defined in TLMP and the TTRA represent net volumes only. On average, in this EIS, the net plus utility volumes are about 19.6% higher than the corresponding net volumes. Net volumes for each harvest unit can be found in Appendix B of the EIS.

Second, stand exam estimates of timber volume and other characteristics are derived from sample plots taken at various points in the field, and can have considerable sampling error. For the Polk Inlet Project, the sample design produced approximately one stand exam plot for each 10 acres within a harvest unit. Therefore, unit volume estimates are based on from 1 to 10 sample plots. Because of the sampling error associated with estimates derived from 1 to 10 plots, one should not assume that whenever there is a difference between the timber type map and the average unit volume, the type map is always incorrect. It is inappropriate to use the Polk Inlet stand exams in this way. The primary purpose of the Polk Inlet stand exams were to provide accurate estimates of volume for an entire alternative consisting of 100 or more harvest units. Accurate estimates for individual harvest units would require far more sample plots.

Additionally, it should be recognized that the timber type map represents a polygon-based stratification for volume and other characteristics over the Project Area. The mapping process produces strata containing variation from the average. It is normal to expect some harvest units to have average volumes per acre at both the upper and the lower boundaries of the volume class. It is also possible to find that some of the harvest units exceed or fall below the volume class limits. This is a function of the resolution of the stratification. The finer the resolution, the lower the variation.

Finally, it is important to recognize that the process of selecting the total unit pool for the Project was completely unconstrained by information on unit volumes. As described in Chapter 2, the only criteria that the ID Team used in determining whether or not to include potential units in the unit pool were related to adjacency, cumulative visual disturbance, cumulative watershed effects, and other Forest Plan standards and guidelines.

See responses to SCF-1, SCF-2, and SCF-3.

SCF-4



# Comments of the Sierra Club Legal Defense Fund



Sumner, Mr. McKinley

## SIERRA CLUB LEGAL DEFENSE FUND, INC.

*The Law Firm for the Environmental Movement*

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Seattle, Washington  
Tallahassee, Florida  
Washington, D.C.

December 14, 1993

Forest Supervisor  
Ketchikan Area  
Tongass National Forest  
Attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK 99901

Dear Forest Supervisor:

The Sierra Club Legal Defense Fund submits these additional comments on the Polk Inlet draft EIS on behalf of its client The Wilderness Society. These comments supplement our comment letter of November 24, 1993.

SCF-5

Subsequent to our earlier comment letter, we obtained documents from the Alaska Department of Fish and Game regarding stand exams conducted by the Forest Service's contractor on the Polk Inlet project, Mason, Bruce and Girard, Inc. The Department's comments are attached hereto and we incorporate them by reference. The stand exam results show that the proposed harvest units contain significantly more Volume Class 6 and 7 timber than indicated by the timber-type maps. Reliance on the timber-type maps in this sale will lead to violations of section 301(c)(2) of the Tongass Timber Reform Act. These discrepancies prove, again, the inaccuracy of the timber-type maps and reinforce the need to adopt a method of calculating proportions that provides reasonably reliable results.

Thank you for your attention to these comments.

Sincerely,

Thomas S. Waldo

Responses to the Sierra Club Legal Defense Fund

SCF-5

Refer to responses to ADFG-59, ADFG-60, and ADFG-61.

## Comments of the Ketchikan Pulp Company



### **Ketchikan Pulp Company**

A wholly owned subsidiary of Louisiana-Pacific Corporation

Post Office Box 6600  
Ketchikan, Alaska 99901  
USA  
TEL 907/225-2151  
FAX 907/225-8260

November 23, 1993

Mr. David Rittenhouse  
Forest Supervisor  
USDA Forest Service  
Ketchikan Area  
Tongass National Forest  
Federal Building  
Ketchikan, Alaska 99901

**Re: Comments on Draft Environmental Impact Statement for Polk Inlet**

Dear David:

Thank you for the opportunity to comment on the Polk Inlet EIS.

KPC-1

In general, we need this volume much sooner than you are currently planning and we need an economic selection of units in order to have an opportunity to make a profit. Alternative 4 appears to be the best choice in the DEIS from this standpoint.

We appreciate your efforts to provide timber to fulfill our contract requirements and the needs of our sawmills and pulp mill. We have had many meetings with the Forest Service regarding the timing and economics to these timber offerings. We will continue to work closely with the Forest Service regarding such contractual matters.

Sincerely,

Martin R. Pihl  
President and General Manager

MRP:tas

WARD COVE PULP MILL  
THORNE BAY LOG  
KETCHIKAN SAWMILL  
TUXEKAN LOG  
NAUKATI LOG  
OPERATING DIVISIONS  
ANNETTE HEVLOCK SAWMILL  
EL CAPITAN LOG

TL404.A

## Responses to the Ketchikan Pulp Company

KPC-1

Comment noted.

## Comments of the Alaska Forest Association

### Alaska Forest Association, Inc.



111 STEOMAN SUITE 200  
KETCHIKAN, ALASKA 99901-6599  
Phone 907-225-6114  
FAX 907-225-5920

AFA-1

AFA-2

AFA-3

November 23, 1993

Dave Rittenhouse, Forest Supervisor  
U.S. Forest Service  
Tongass National Forest  
Federal Building  
Ketchikan, AK 99901

RE: Polk Inlet EIS

Dear Dave:

AFA wishes to comment on the Polk Inlet EIS. We appreciate the chance to share our views.

Southeast Alaska's natural resource dependent communities are in grave need of pipeline volume to maintain the region's economic engines. The expedient and timely completion of this EIS is very important. A delay will mean the loss of jobs and human suffering.

AFA endorses Alternative 4 as the alternative which should be selected. The lower operating costs, reduced helicopter yarding and the higher returns to Federal and State governments is very important.

In completing this project, we suggest:

- The production of a timber sale economic report card as outlined by AFA.
- Insure at least two mmbf are harvested for each mile of new road construction.
- Do not require excessive road standards which are higher then necessary to safely remove timber volume.
- Insure each timber offering meets the minimum economic "mid-market" test.

## Responses to the Alaska Forest Association

Comment noted.

Comment noted.

a) An economic analysis of proposed timber harvest is presented in the Economic and Social Environment section of Chapter 4. This analysis is based on a mid-market assessment and the relative economic performance of each timber harvest alternative. It is important to recognize that the values presented represent very preliminary estimates of future timber sale revenues and costs. Regional average costs and values, with some adjustments for local conditions were used. Prior to the time each sale is offered, each unit and road will be cruised to determine the quantity, quality, and value of timber. A formal appraisal and timber sale report will be prepared incorporating current quarter selling values and cost information plus a normal profit and risk margin.

b) Stricter economic criteria were used initially in the framework for Alternative 4; however, these had to be relaxed in order to reach the volume required by the purpose and need. It should be noted that the Forest Plan ASQ does not use economic selection criteria; therefore, most of the action alternatives include less economic units and groupings. This provides Forest Plan monitoring information specific to this project, as well as promoting informed and reasoned decision-making.

c) Road standards will be consistent with resource objectives associated with the road location.

d) This suggested requirement applies at the offering stage and not at the EIS stage.

e) Refer to response to part a.

f) Unit designs are consistent with normal, safe operations. For example, trees left in units for current and future structure needs have been designed consistent with "Reserve Tree Selection Guidelines" (Forest Service 1993).

g) LTF's will be designed to best meet site-specific objectives.



Comments of the Alaska Forest AssociationResponses to the Alaska Forest AssociationAFA-3  
(cont.)

e. Costs should be developed to insure accurate economic analysis and comparisons. We urge the ID team to work with AFA and its committees on this issue.

AFA-4  
Comment noted.

f. For safety reasons, the requirement of harvest systems must be flexible.

g. Log transfer facilities must be low impact, low cost, low angle slides instead of A frames or barge facilities.

AFA-5  
Comment noted.

AFA-4

In addition, we support RMP's as the most effective method of protecting all resources. These RMP's protect the environment and can be updated as needed.

AFA-5

Last, we object to the implementation of the recently released Karst assessment report and its implementation without blind peer review and extensive public involvement. AFA feels the Karst review and contract has been a closed door affair.

Thank you for the opportunity to comment.

Sincerely,  
  
 Troy Reinhardt  
 Executive Director

cc APA Board of Directors-Information Only  
 Senator Ted Stevens  
 Senator Frank Murkowski  
 Congressman Don Young  
 Governor Walter Hickel  
 Representative Bill Williams  
 Mike Barton, Forest Supervisor

## Comments of the Narrows Conservation Council

November 1, 1993

David Rittenhouse  
Forest Supervisor  
Ketchikan Area, Tongass National Forest  
Federal Building  
Ketchikan, AK 99901

Mr. Rittenhouse:

Thank you for the opportunity to comment on the Polk Inlet Draft EIS. It seems an inordinately long time since scoping began for this project--August 1991. What is the delay? During this same time frame, both the CPOW and North Revilla DEIS's, FEIS's, and ROD's were completed. It is my understanding that CPOW and North Revilla were completed by Forest Service staff, while Polk Inlet and the still uncompleted Lab Bay are being prepared by professional service contracts.

Mr. Rittenhouse, I must tell you that I am very concerned at the cost and slowness of these contract-produced EIS's. It my understanding that you recently cancelled a contract for Heceta Island which was reputed to cost \$3 million for 75 mmbf--or \$40 per mbf. Your ROD alternative for CPOW indicated a mid-market stumpage value of under \$4 per mbf. Do you mean to tell me that these EIS's are costing 10 times the projected stumpage? If these timber projects are not cost effective, then the Forest Service should not be pursuing them. I recall an article from the "London Times" several years ago which stated, "The Forest Service is an agency which loses money cutting trees that almost everyone would prefer to be left standing for owls to live in." I formally request to have cost recovery of the Polk Inlet project elevated to a significant issue for the FEIS. I also formally request the Polk Inlet FEIS show a current value appraisal (as was done for CPOW) and a complete TSPIRS analysis after payments to the State of Alaska.

I am deeply disturbed at the purpose and need for this project. According to DEIS page 1-7, the target volume for this project (125 mmbf) was determined by assuming it was necessary to provide 820 mmbf to KPC over a 4 year period, or 205 mmbf annually. This is the average annual harvest level needed to 'payoff' the KPC contract by June 30, 2004. Mr. Rittenhouse, that is not the intent of the KPC contract clause B0.1, which clearly states that 8.25 bbf is a ceiling, not a mandate. Contract clause B0.52 states that the average annual harvest for any 5 year period may not exceed 192.5 mmbf. Yet your purpose and need has predetermined that this will be exceeded. What is going on here?

Furthermore, the projects on DEIS page 1-8 total 930 mmbf, not 820 mmbf. That is because you decided to offer 107 mmbf of former independent timber to KPC. I also understand that additional independent sales will be offered to KPC. Mr. Rittenhouse, how much independent timber do you intend to offer KPC? And why isn't this

NCC-1

NCC-2

NCC-3

## Responses to the Narrows Conservation Council

NCC-1

The Polk Inlet EIS is lagging behind the CPOW and North Revilla EIS's for two important reasons. First, scoping was initiated by the Forest Service for all three projects and was further along for CPOW and North Revilla by the time the Polk Inlet contract was awarded. For example, scoping for the North Revilla Project was initiated with publication of the Notice of Intent (NOI) and a public mailing in June 1991. For CPOW and Polk Inlet these events both occurred in August 1991, but Polk Inlet required a revised NOI in August 1992. In addition, the tentative alternatives for CPOW were identified and a second public mailing was issued in March 1992, about the time the Polk Inlet contract was awarded and before the ID Team had even been formed.

Second, the Polk Inlet EIS is the only EIS of the three in which the potential harvest units and roads have been fully field-verified. This field verification process took place from shortly after contract award in May 1992 through September 1992. Field verification involved collection of a large amount of timber stand exam, engineering, and resource information by a variety of disciplines. These data required considerable time to check, process, digitize into the GIS database, and incorporate into resource reports prior to preparing the EIS. Additionally, delays between the DEIS and FEIS have been related to FEIS adjustments for ongoing litigation and appeals, agreement with the State to hold additional meetings (CZMA) prior to the FEIS, etc.

Refer to responses to AFA-3 and SEAC-17. The mid-market test is intended to be a basic feasibility test based on previous long-term cost and price averages. It is used in the EIS to show which "sub areas" of alternatives may be at risk of being economically feasible. These areas are kept in the alternatives in case actual or future timber values are higher than the mid-market results. An example of this is the Little Coal Bay geographical area in Alternative 4. The mid-market test indicates this "sub area" would need an increase of approximately \$30 per MBF in selling value to be economically feasible. Dropping this "sub area" would reduce the available volume for Alternative 4 (and other alternatives) by approximately 10 million board feet. Recent timber sale appraisals and bid rates indicate the Little Coal Bay geographic area will be economically feasible.

See response to GRP-5.

NCC-2

NCC-3

## Comments of the Narrows Conservation Council

## Responses to the Narrows Conservation Council

NCC-3  
(cont.)

volume reflected in a reduced purpose and need for Polk Inlet and the other ongoing/recently-completed projects? I formally request to have the purpose and need for this project re-evaluated.

NCC-4

I am also very concerned with the non-existent range of alternatives for this project (124 - 127 mmbf). I recently read an opinion by Texas Judge, Robert M. Parker (1993 WL 172660 (E.D.Tex)) which completely countermands this 'result-driven decision-making process.' Both Judge Parker's decision and others (731 F.Supp 970, 989 (D.Colo.1989)) found that situations where "the Forest Service had first established timber production goals and then formulated its 'alternatives' in a manner guaranteeing that the Service planners would reach these goals...does not constitute a consideration of a broad range of alternatives as contemplated by 36 CFR Sec 219.12(f)." Mr. Rittenhouse, what you are proposing has ALREADY been found to be in violation of NEPA. You are wasting the taxpayers' money in producing a plethora of EIS's which have no chance of being favorably reviewed by the courts. I formally request to have a much wider range of alternatives in the Final EIS.

NCC-5

I am shocked at the high percentage of harvest proposed by each alternative to come from clearcut harvest (85 - 94% according to DEIS page 2-25). Not only is this level of clearcut harvest contrary to the direction established by former-Chief Dale Robertson to reduce clearcutting, but Judge Parker also found, "the monoculture created by clearcutting and resultant even-aged management techniques is contrary to NFMA-mandated biodiversity (16 USC Secs 1604(g)(3)(B) and 1604(g)(3)(F)(v))." I formally request you obey your agency's direction (as well as NFMA) and reduce the percentage of clearcut harvest.

NCC-6

I am also very concerned about the tie of this document to the 1979 TLMP, as amended. So much significant new information has arisen recently: Tom Aley's preliminary findings on the significance of the karst; PACFISH; former-Chief Dale Robertson's direction to reduce clearcutting on National Forests; site specific logging plans which find significant portions of the TLMP timber base to be inoperable. I think it is critical to reanalyze the Tongass timber base to determine if the levels of harvest you have unilaterally decided upon for the Polk Inlet (and other) projects(s) is truly sustainable. I formally request that you issue a supplement to TLMP and delay Polk Inlet (and all other) project(s) until that is accomplished.

NCC-7

Mr. Rittenhouse, please do not dismiss this request as 'beyond the scope of the project.' The tie of Polk Inlet to TLMP is irrevocably severed in light of significant new information. I strongly urge you to supplement TLMP before proceeding with this project.

I have been hearing a lot recently about unauthorized, illegal expansion of harvest units on the Ketchikan Area. I formally request that there be no unit expansion during the implementation of this project. I also formally request that all areas deferred

NCC-4

See responses to ADFG-47, GRP-1, and GRP-5.

NCC-5

Silvicultural systems, criteria for their selection, and rationale for their selection, including the selection of the clearcutting system for harvest, are discussed in detail in the FEIS. See Chapter 3, Vegetation and Timber Resources, Silvicultural Systems. As noted, the alternatives include clearcut harvesting on 85% to 94% of the acres. Alternative F5 is the one with the least clearcutting. Furthermore, the clearcuts prescribed in the Polk Inlet EIS (Types A-D clearcuts) are different than most previous clearcuts in southeast Alaska. They provide greater snag and green tree retention and generally greater structural diversity. See Chapter 2, Mitigation Measures, or Chapter 3, Vegetation and Timber Resources, Silvicultural Systems, for a detailed description of the clearcut types.

NCC-6

The TLMP (1979, as amended in 1986 and 1991) is the existing Forest Plan and provides the current direction to the Polk Inlet Project. In addition, Polk Inlet is consistent with the standards and guidelines outlined in Alternative P of the TLMP Draft Revision. Appendix A explains why the Polk Inlet Project is scheduled for environmental analysis at this time.

The purpose and need in Chapter 1 states that this action is in part to help satisfy the 3-year current timber supply requirement of the long-term contract with KPC. In addition, the action is also needed to satisfy the obligation set by Congress under the TTRA "... to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources seek to provide a supply of timber from the Tongass National Forest which meets the annual market demand ...". Because these two components of the purpose and need relate to providing timber volume within a specific timeline, it is not reasonable to delay the project until the TLMP Revision is finalized.

Refer to responses to ADFG-39 (regarding cave and karst resources), SEAC-9 (regarding PACFISH), and NCC-5 (regarding clearcutting). It is assumed that the reference to site-specific logging plans refers to the Central Prince of Wales (CPOW) Project MELP. Please note that this MELP was based in part on "relatively low risk to environmental concern units" and project economics. The original CPOW MELP did not evaluate all potentially suitable and available timberlands. Its purpose was to identify units for the current project, not to exclude areas for harvest over the long term.

NCC-7

See response to ADFG-41



## Comments of the Narrows Conservation Council

## Responses to the Narrows Conservation Council

NCC-7 (cont.)	from harvest during planning, layout, and harvest be formally deleted from the TLMF timber base. If they can't be logged economically, then remove them so they don't just sit there and grind out phony ASQ's which falsely justify the non-sustainable harvest of the Tongass National Forest.	NCC-8	See response to ADFG-9.
NCC-8	Mr. Rittenhouse, I notice on DEIS page 3-77 that both Management Areas within the project area are now out of compliance with proportionality. How could this have happened if the 1989-94 ROD was modified to assure harvest would meet TNGA proportionality constraints? I formally ask you if this proportionality departure is a result of unit expansion. I also notice that all of the alternatives propose to maintain this departure after implementation. Some of the alternatives maintain this departure outside the tolerances specified in Your own Forest Service Handbook. I formally request that all alternatives presented in the FEIS achieve proportionality parity.	NCC-9	No attempt has been made to evaluate sustained yield specifically in the Polk Inlet Project Area. This is a Forest Plan-level exercise and beyond the scope of a Project-level EIS. The Forest Plan addresses sustained yield on a Ketchikan Area basis. The Forest Plan is currently under revision giving consideration to the factors you mention and the timber supply analysis presented in the Timber and Vegetation Resources section of Chapter 4.
NCC-9	I am very concerned with the timber supply discussions in Chapter 3-4, Vegetation and Timber section. Seemingly, the LSTA identified some acres which were inoperable during the paper plan stage. Then 32 units were found during recon to be inoperable, as well as other units reduced in size because of operability concerns. Then there is expected to be up to 21% falldown of the total base due to economic conditions and another 10% due to operability again. Finally, TLMF (to which this document is tied and bound) proposes to cut all but 11% of the initial base without considering the facts cited above. When PACFISH, karst, non-clearcut harvest methods, economics, and operability are factored in, TLMF timber supply estimates come unraveled very quickly. This is not sustainable timber harvest. President Clinton's PNW Timber Summit talks about "PSQ" (probable sustained quantity) as opposed to "ASQ" (allowable sale quantity). I formally request that you obey President Clinton and table the Polk Inlet EIS until a probable sustainable harvest level is determined.	NCC-10	If one examines the differences among the Polk Inlet, North Revilla, and CPOW projects, the differences in costs and values do not seem "much different" as you suggest. For example, the road costs, especially the LTF costs, that you suggest may be significantly understated, look appropriate when one observes that both the North Revilla and the CPOW projects require the construction/reconstruction of substantially more road miles per MBF than Polk Inlet. One of the reasons for this is that the Polk Inlet Project calls for more helicopter yarding than the other two projects. In addition, the Polk Inlet Project requires the development of only one LTF in two alternatives and none in the other two action alternatives. The North Revilla Project requires the construction/reconstruction of seven LTF's in each action alternative. The CPOW Project does not require LTF development. Refinements have been made to the Polk Inlet economic analysis in the FEIS.
NCC-10	The mid-market assessment on DEIS page 4-131 is troubling. The pond values, logging costs, and road construction costs seem to be much different than those used for North Revilla and CPOW, which had similar/identical Notice of Intent dates. The road costs look significantly understated, especially the LTF cost estimates. I formally request that the FEIS show the unit costs and methodologies explicitly, so I can compare them with those used for CPOW and North Revilla. I suspect that the mid-market stumpages are in error and are considerably overstated.	NCC-11	The biodiversity section has been substantially revised in the FEIS. Old-growth retention areas have been identified. These were reviewed with ADF&G prior to the finalization of their extent and location.
NCC-11	In reviewing the Wildlife sections, I could find no proposal for Old-Growth Retention areas. The existing TLMF requires that these areas be identified in site specific NEPA projects. I did not like your treatment of Old-Growth Retention in North Revilla and CPOW where you unilaterally decided on the extent and location of these areas in your ROD. Because of the disastrous effects upon wildlife habitat caused by your unsustainable level of timber harvest, it is critical that these areas be identified in the DEIS, so that the		

Comments of the Narrows Conservation CouncilResponses to the Narrows Conservation CouncilNCC-11  
(cont.)

public can review and comment upon them. I formally ask you to reissue the Polk Inlet DEIS and include Old-Growth Retention Areas, so that the public can review and comment upon them.

NCC-12

Mr. Rittenhouse, I am sorry to seem so negative, but this 'results driven decision-making process' is totally unacceptable to me. I realize the Forest Service and contractor have spent a great deal of time and expense in preparing this DEIS. Unfortunately that is the very problem: too much time and money have been spent trying to bring about a future that I simply do not want for the Tongass National Forest. Thank-you for being gracious enough to record my comments.

NCC-12

Comment noted.

Sincerely,



Victoria McDonald  
Narrows Conservation Council

cc: Buck Lindekeugel, SEACC

**Comments of the Sunny Cove  
Homeowners & Mariculture**

**Sunny Cove Homeowners and Sunny Cove  
Mariculture, Inc.**

**P. O. Box 5235  
Ketchikan, Alaska 99901  
(907) 225-3751 - Fax (907) 247-0833**

November 24, 1993

Forest Supervisor  
Tongass National Forest  
Attn: Polk Inlet  
Federal Building  
Ketchikan, AK 99901

**SUBJECT: POLK INLET Draft Environmental Impact Statement**

Dear Sir:

As property owners, part-time residents and oyster farmers in Cholmondeley Sound, we would like to make the following comments on the Polk Inlet Draft Environmental Impact Statement.

**SCH-1**

Of the five Alternatives presented, we MOSTLY support Alternative 5 - with the exclusion of harvest units in McKenzie Inlet. McKenzie Inlet is the last arm in the Polk Inlet, Skowl Arm area which has not been present-day logged. In view of the recent soil instability on Prince of Wales Island, as evidenced by the mudslides in October of this year, prior logged areas as those found in McKenzie Inlet are prime areas for slides. Add more tree removal to this area and it is one step closer to devastation by nature as well as man. The West Arm of Cholmondeley Sound also had a mudslide this October - at a previously logged location. We feel the existing visual quality of both McKenzie Inlet and Cholmondeley Sound as well as the wildlife habitat MUST be protected and we STRONGLY feel that McKenzie Inlet and the Sunny Cove Drainage Unit 675, SHOULD BE added to the Old Tom's Creek Natural Area. Any existing roads in the McKenzie Inlet area should not be kept open for vehicular traffic or employed into a permanent road system.

**SCH-2**

Alternative 3 shows harvest units in Sunny Cove, area 675. There are five existing cabins in Sunny Cove which are at present part-time residences. There is a State permitted Oyster Farm at this location also which has been in existence since 1987. The Oyster Farm has two buoy line cultures in the mouth of the cove and one log suspension raft in a small bite in the cove. We are tested two times per year by the State for clean water at our sites. Oyster cultivation requires clean water. Our oysters are wonderful because of our growing habitat. A log transfer facility at the mouth of Sunny Cove would wipe out our operation. Sunny Creek is also the third largest producer of pink salmon in Southeast Alaska. When the fish population of the world is decreasing, why are we trying to wipe out our Alaskan fish producing streams, also? Logging all over Cholmondeley Sound by native Corporations and the Forest Service has caused much noise and stress on Sound residents and wildlife. It has also changed the safe anchorages in the Sound. Fall seiners and winter shrimpers no longer have calm coves to anchor up in. Should a floating camp be put in Sunny Cove, there would be no place to anchor it. Soil studies in Sunny Cove show alot of instability. Overlogging this area would indeed produce slides in our backyard. The proposed logging road would also cross over our existing water supply.

**Responses to the Sunny Cove  
Homeowners & Mariculture**

Comment noted.

SCH-1

Comment noted. The potential impacts you describe were considered in the DEIS and are addressed more fully in the FEIS. Additionally, discussion of the oyster mariculture operation has been added to the text.

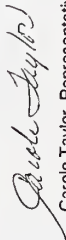
SCH-2



Comments of the Sunny Cove  
Homeowners & Mariculture

I am attaching a recent letter to the Corps of Engineers regarding the Haida Log Transfer Facility application in the West Arm of Cholmondeley Sound. This letter expresses our feelings as homeowners and mariculturists and Alaskans who have a vested interest in the Cholmondeley Sound area. We feel logging this area has been overdone. We also feel in your presentation of the EIS, you do not address two points (1) the Native logging in the proposed areas and (2) the proposed logging in adjacent areas which are not covered in the EIS in question. Asking people to comment without showing this is clouding the issue and not presenting all the facts.

Sincerely,



Carole Taylor, Representative  
Sunny Cove Homeowners  
Sunny Cove Mariculture, Inc.

Enc

SCH-3

SCH-3

The cumulative effects of harvest on private and other adjacent lands are discussed throughout the EIS. Particular emphasis is given in the Chapter 3, Visual Resources section, and the Chapter 4, Wildlife, Subsistence, and Visual Resource sections. In addition, Chapter 2 describes how existing and future potential harvests on these lands were considered in a major way, in the development of alternatives. Regarding LTF's, refer to response to EPA-13.

Responses to the Sunny Cove  
Homeowners & Mariculture

## Comments of the Sunny Cove Homeowners & Mariculture

SUNNY COVE HOMEOWNERS and SUNNY COVE  
MARICULTURE, INC.

P.O. Box 5235  
Ketchikan, Alaska 99901  
(907) 225-3751 Fax (907) 247-0833

November 4, 1993

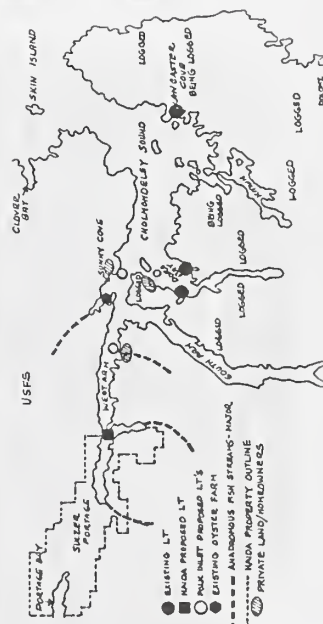
U.S. Army Corps of Engineers  
Alaska District  
Regulatory Branch  
P.O. Box 898  
Anchorage, AK 99506-0898

SUBJECT: COE Reference 2-930437/EPA Reference AK-005235-3/Cholmondeley Sound 23

Dear Sir:

As both property owners and mariculturists in Sunny Cove, Cholmondeley Sound, Prince of Wales Island, Alaska, we would like to state that we strenuously object to the proposed LTF, sorting/storage area and log ship mooring facility the Haida Corp is proposing in the West Arm of Cholmondeley Sound at the mouth of a major adromonous fish stream. We do not feel that we Alaskans should compromise and give up our clean water, lifestyle, wildlife and marine inhabitants to a "single" group because its property is not in a location which provides conditions for a properly permitted LT site. We would like to address the following:

**AESTHETICS.** Ten years ago, Cholmondeley Sound was a very pristine wilderness location with one permanent resident and two private cannery sites, one with recreational cabins. Dora Bay would have qualified as a candidate for an Alaskan State Park because of its beauty. The Sulzer Portage which the Haidas now own could have been an Historical area, preserving the history of Alaska. Now, coming into the mouth of Cholmondeley Sound, on the left you see denuded hills from logging by the Kootznoodoo Corporation. The Lancaster Cove area is again to be logged by the Forest Service. Dora Bay is currently being logged by the Kootznoodoo Corporation and has two LT sites and a camp within. Divide Head, logged, is now treeless. The left side of the South Arm is logged. The only portion left in Cholmondeley Sound which has not been logged is Sunny Cove and the West Arm. The Haidas own the portage and land in the West Arm up to Lagoon/Big Creek and will commence logging here. Since the Haidas own the Portage which encompasses the majority of their land holdings in this area, let them extend their road to Portage Bay in Hetta Inlet and take their logs out that direction. The Haidas do not own the water in this very scenic area. It belongs to you and me, too. We CAN do something about saving the quality of it and its inhabitants for the rest of the Alaskans, visitors, and generations to come.



## Comments of the Sunny Cove Homeowners & Mariculture

FISH AND WILDLIFE VALUES. The poor flushing of the proposed LTS in the West Arm WILL change the fisheries in this area. At present, shrimp are very prevalent and are commercially harvested. One year-round resident/property-owner of the West Arm relies on the shrimp he commercially harvests there for his family's livelihood. Also, shrimpers from Ketchikan regularly harvest shrimp from this area. Recreational users and Chalmers Sound property/homeowners shrimp here on a regular basis. The shrimp will leave the area as the bottom becomes contaminated. Diving studies show that sea cucumbers are also present in commercial quantities in the West Arm. The poor flushing and the dumping of bark on the bottom will eradicate this fishery opportunity. Our fisheries must be protected. Chalmers Sound is a major Southeast salmon habitat.

Ketchikan Daily News

Saturday-Sunday, Oct. 23-24, 1993

### Southeast Alaska fisheries

#### District 2 seine

The Department of Fish and Game announced that the District 2 fall chum salmon purse seine fishery will be closed for the 1993 season effective 7 p.m. Oct. 23. The total harvest of 190,000 chum salmon is one of the highest harvests on record for the District 2 fall chum fishery. Chum escapements were also very strong in Lagoon and Disappearance Creeks, the two primary spawning systems in Chalmers Sound.

To get to the proposed LTS in the West Arm, four (4) major anadromous fish streams are passed. There is also one more anadromous fish stream at the end of the West Arm on the Haida property. Pinks and chum salmon have major, major runs for the Fall fisheries with small runs of sockeye and coho. The Sound is also a king fishery for the trollers. The West Arm is a long, narrow finger. What will ten years of dumping logs, setting bark, log ships and camp activities do to these fisheries? Every fish run will be affected because every single one has to be passed by/through to get to the proposed location of the LTF/sortyard and ship mooring facility in the West Arm. Why is another ship mooring facility proposed in an unsuitable area, when a deep water mooring facility that will handle more than one ship at a time already exists in Dora Bay? The past week's rains on POW have caused a major slide in the West Arm between Lagoon/Big Creek and the Portage in close proximity to the area proposed for the ship moorage. It does not seem appropriate to put in a moorage and floating camp in such an unstable area.

Have any studies been made to examine the bottom of the two existing sites in Dora Bay? If not, why? This information would give much relevant information concerning the currents and marine inhabitants of this area after several years of intensive logging and camp activities. As recreational shrimpers, we can attest that the areas, near the two Dora Bay LTFs where Sunny Cove homeowners used to shrimp and do very well, are now shrimpless.

Sunny Cove is also the site of a State permitted Mariculture operation (ADL 105328 ADFG 90-31 AF). Oysters and scallops are being cultured for commercial harvest. This operation has been in existence in Sunny Cove since 1987. Oysters require clean water to grow in. The oyster site must be certified by the State each year. At this time our water in Sunny Cove is very clean. What will ten years of dumping do to this farm? What happens in the West Arm does affect Sunny Cove due to water and air currents. Turbidity of water also influences the culture of oysters. This year, because of the change in wind and water action due to the logging that has previously gone on in the Sound and at Dolomi, the cabin owners in Sunny Cove are having to put in a breakwater to protect their float. COE #M-750253, Chalmers Sound 13. Sunny Cove Mariculture has two permitted buoy lines for oyster culture outside the "hole" where their current operation is being farmed. With increased water usage by tugs, log ships, and camp activities passing this area, plus the logging of trees in the West Arm, what will happen to this oyster culture by the increased turbidity of these waters caused by the wind and water activities?

## Responses to the Sunny Cove Homeowners & Mariculture



## Comments of the Sunny Cove Homeowners & Mariculture

As homeowners in this area, we are very intune with the wildlife of the Sound. The end of the West Arm and the Lagoon/Big Creek area are habitats for a wide variety of birds, ducks and eagles. There are year-round Canadian geese, plus transient flocks of mallards, Canadian geese, mergansers, old squaws, goldeneyes, loons and blue herons. During the fall fisheries, you can go into Lagoon Creek and see a hundred eagles all at once - five to ten per tree all along the banks. In the West Arm, on any given excursion, you almost always see sea lions and seals. What will happen to this marine life? As frequent residents of this area, we have noticed a decrease in the numbers of seals we see. A recent seal study conducted by The National Marine Fisheries Service also shows a decrease in the number of seals in the Cholimondeley Sound area compared to a prior study done ten years ago. This study also shows the West Arm as a major habitat for seals.

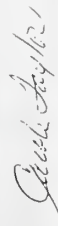
**ENDANGERED SPECIES:** The Humpback whale comes into Cholimondeley Sound because of the shrimp krill. The stings of the humpbacks by the Sunny Cove homeowners have decreased since the logging began in this Sound. Fewer shrimp in the West Arm due to the change in the Sound bottom because of the proposed LTS and activities will further endanger the feeding habitats of the Humpback whale. In the summer and fall, as you come into Cholimondeley Sound on the right hand side, there is a sea lion haul-out rock. There are usually ten to twelve sea lions visible on the rocks. These sea lions and others roam the Sound and the West Arm. What will happen to their habitat with the LTF activity in the West Arm?

**NAVIGATION:** The West Arm is long and narrow. It is not wide, being less than one mile in width. In the Fall, commercial shrimpers fill the area with their pots. Fall seiners set their nets. How are Sound property owners with their boats, recreationalists, shrimpers, fall seiners, tugs, 750 foot log ships, workboats, camp boats and float planes supposed to maneuver in this channel? Also, should the winter be cold, the West Arm will freeze up to this proposed site and beyond even as far as Divide Head. If year-round operation is desired, this doesn't make sense for a good spot for an LTS.

**NEEDS AND WELFARE OF THE PEOPLE:** Cholimondeley Sound has changed in the last ten (10) years. Many people have purchased private property in this area and are becoming year-round residents. Having clean water and an abundance of marine and wildlife is very important to their subsistence lifestyle. Since Cholimondeley Sound is known for its fish and shrimp, many more recreationalists are using this area due to its relatively close proximity to Ketchikan. A commercial fishing lodge at Clover Bay in the mouth of Cholimondeley Sound offers tourism and fishing opportunities to tourists from all over. An oyster farm is steadily growing and producing commercial oysters for sale. All of these activities depend on clean water, an abundance of fish and wildlife and no additional interference with Mother Nature.

As homeowners, as mariculturists, as Alaskans, we ask that you look at what has gone on over the ENTIRE Cholimondeley Sound area when considering this proposed LTF, sorting yard and ship mooring facility. We still have the unknown outcome of the Polk Inlet KPC Long Term Timber Sale Contract to contend with which proposes more logging, more LT sites for the West Arm and Sunny Cove areas. We STRONGLY ask that no decision on this proposed LTS be made until the outcome of the Polk Inlet KPC Long Term Timber Sale Contract is finalized. Finally, we ask that this application be DENIED.

Sincerely,



Carole Taylor, Representative  
Sunny Cove Homeowners  
Sunny Cove Mariculture

## Responses to the Sunny Cove Homeowners & Mariculture

## Comments of the Alaskans for Responsible Resource Management

Tokeen PO Box TKI  
Ketchikan, Ak 99950-0230  
November 16, 1993

Forest Supervisor, Ketchikan Area  
Tongass National Forest  
Federal Building  
Ketchikan, Ak 99901

Attn: Polk Inlet EIS

It is obvious that the latest Forest Service scheme is to prevent the public from playing a meaningful part in logging plans by producing a endless torrent of documents, thereby drowning concerned citizens. This DEIS fits right in with the scheme.

The Forest Service has proven itself to be adept at misleading the public, but in thies DEIS, misleading becomes lying. Nonforest land is established at less than 10% forest. Volume class 3 (0-8 mbf/acre) is clearly nonforest land and should be added into that figure. Volume class 3 is always inoperable; volume class 4, on the lower end, is frequently inoperable. Throwing these volumes into the pool of available timber is a GROSS distortion of fact. Deleting volume class 3 from the suitable and available CFL of 50,972 acres leaves 28,997 potential acres -- a substantial difference.

Effects of timber industry facilities and employees on local fish and game populations and impacts on subsistence users and other recreationists are not difficult to predict or estimate. APC camps have been around for forty years. The consistent adverse effects and impacts of these camps and their personnel are extremely well known to local people. Feigning ignorance is unacceptable.

The casual discussion of the elimination of the preferred recreational opportunity is distressing. If the Forest Service continues to manage the Tongass, it will never "revert back to semi-primitive conditions". The changes, and the lost opportunities, will be permanent.

While the DEIS acknowledges the economic vulnerability of the area, the desire to broaden the base of economic activity, and that economic diversification reduces fluctuations, it ignores the repercussions of this very plan and the fact that the Forest Service goal is the exact opposite.

The community profile section is interesting reading, especially the comments of community stability, but the impacts of this plan, in conjunction with other plans and prior activity, is not discussed at all.

## Responses to the Alaskans for Responsible Resource Management

There was no attempt to mislead or lie to the public in this EIS. The ID Team has made every attempt to clearly describe the existing conditions and accurately display the effects of the alternatives. The use of 10% tree cover as the minimum criterion for defining forest land is a broadly used convention for vegetation or cover mapping. The entire Tongass GIS database is set up this way. See response to ADFG-42.

Volume Class 3 lands may or may not be covered by forest but are considered commercial forest land (CFL) if they are capable of producing 20 cubic feet of annual tree growth per acre; they are generally second-growth areas. Operability does not refer to volume class, but rather to the economics associated with the logging system necessary to yard the trees from stump to landing (see descriptions of CFL and operability under the Forest Land Classification section of the Vegetation and Timber Resources section of Chapter 3).

The suitable and available CFL for the Polk Inlet Project is shown in Tables 3-24 and 3-25. These tables clearly separate the 16,059 acres of second growth (which includes all areas mapped as Volume Class 3) from the 50,972 acres of old growth (which consists only of Volume Classes 4-7). The total suitable-available CFL, as shown in these tables, is the sum of the second-growth and old-growth acres, or 67,031 acres. An additional 23,029 acres of old-growth CFL is withdrawn from the suitable-available category.

It also should be noted that an additional 64,201 acres of noncommercial forest land occurs in the Project Area. These lands are not given a volume classification because they are not considered to be CFL. They may contain timber with greater than or less than 8 MBF/acre.

Logging personnel can place heavy pressures on local stocks of fish and game for the period of time they are in the area. However, logging activities conducted from most temporary camps (as are most of the Polk Inlet Project camps) are relatively short term (3-5 years), the long-term impacts on fish and game populations is not expected to be great.

Activities associated with ROS settings of primitive (P), semi-primitive motorized (SPM), and semi-primitive non-motorized (SPNM) are the fastest growing activities on the Tongass National Forest (TLMF Draft Revision 1991a). The TLMF Draft Revision recognizes that many areas with ROS settings of P, SPM, and SPNM will be eliminated as a result of harvest activities and that there will be more opportunities for roaded recreation. The changes associated with the action alternatives for the Polk Inlet Project are consistent with the management direction given by TLMF (1979, as amended) and the TLMF Draft Revision (1991a).

ARRM-1

ARRM-2

ARRM-3

ARRM-1

ARRM-2

ARRM-3

ARRM-4

## Comments of the Alaskans for Responsible Resource Management

ARRM-5 The recent slides IN THIS VERY AREA are a clear indication that roading and logging are taking place in areas that are both too steep and too unstable. One death has already occurred. It is one too many.

ARRM-6 Exactly what is the basis for determining that viewing scenery and automobile travel are the two most popular outdoor recreational activities? It is certainly possible that both of these activities are incidental, such as a person driving from Criag to Hollis to catch a ferry and glancing out the window now and then. This is hardly a recreational activity.

ARRM-7 The section of biodiversity is too vague and limited in scope to be of any value, other than to make the obvious point that biodiversity in this area will soon be nonexistent.

I have a number of other comments I would like to make on this plan, but because of the intense pressure being exerted by the Forest Service to disenfranchise the public, and because I have other pressing commitments, I do not have the available time.. Anyway, it is clear that, as usual, the Forest Service has no intention of honestly considering public concerns and comments.

Sincerely,

*Sylvia Geraghty*  
Sylvia Geraghty, Chair  
Alaskans for Responsible  
Resource Management

## Responses to the Alaskans for Responsible Resource Management

ARRM-4	The issues raised here are addressed in detail in Chapter 4, Economic and Social Environment, under Socioeconomic Analysis (especially subsections on Localized Economic Implications and Community Stability and Lifestyles), Sectoral Economic Effects, and Cumulative Effects (which specifically addresses the impacts of Polk Inlet in conjunction with other Prince of Wales projects).
ARRM-5	Refer to responses to ADFG-5 and SEACC-26. Additionally, the EIS discusses areas in which field reconnaissance indicated that road building was unfeasible and recommended that units past these sites be accessed and harvested utilizing helicopters.
ARRM-6	See response to MR-15.
ARRM-7	Comment noted. The sections on Biodiversity have been refined in the FEIS.



## Comments of the Green Monster Minerals

Douglas C. Toland  
Green Monster Minerals  
P.O. Box 32674  
Juneau, AK 99803

907 789-2805

November 10, 1993

Ed Gensler, Mining Engineer  
Engineering and Economic Evaluation  
U.S. Bureau of Mines  
P.O. Box 20550  
Juneau, AK 99802

Dear Mr. Gensler:

*Ed*

Thank you for the information on the U.S. Forest Service's Polk Inlet Timber sale DEIS wherein reference is made to the privately owned claims on nearby Green Monster Mountain. To be current with the status of the claims, the USFS reference to Green Monster Mountain should include the following information:

"The patented Green Monster claims are currently being systematically and carefully developed by their owners, Green Monster Minerals and Alaska Minerals. Prior to purchasing the property in 1980, the proprietors of these Alaskan companies worked the deposit for several years under a lease arrangement with the previous owner, Little Squaw Mining Company of Spokane, Washington.

Exploration, development, and limited production of mineral specimens have occurred continuously on the claims for at least 17 years. Activity is expected to continue indefinitely under the present ownership.

With no exceptions, these claims remain closed to trespass. This off-limits policy is due to liability concerns, and the need to protect an investment in a scarce and fragile resource."

Sincerely,

*Douglas C. Toland*  
Douglas C. Toland, Proprietor  
Green Monster Minerals

cc. Thomas R. Hanna, Alaska Minerals

## Responses to the Green Monster Minerals

GMM-1

The suggested changes have been incorporated into the appropriate places in the EIS.

GMM-1

Alaska Minerals  
2470 Engineers Court  
Juneau, Alaska 99801

DATE November 10, 1993

TO: Dave Arrasmith  
U.S. Forest Service  
Ketchikan Ranger District

SUBJECT: Polk Inlet Timber Sale DEIS: Correction for Green Monster Mountain Claims

FROM: Tom Hanna  
Telephone: 789-0637, Fax 789-9487

Late this afternoon I was made aware of inaccurate descriptive information in the Polk Inlet Timber Sale DEIS for the patented Green Monster block of 14 claims, which my partner Douglas Toland and I own outright. Both Doug and I are concerned about the description and request that it be corrected to accurately reflect the reality of these claims.

Attached are Doug Toland's comments to the U.S. Bureau of Mines, which I fully support and request that they be included in the comments regarding the Polk Inlet Timber Sale DEIS. In addition, I would like to add my own comments:

1. The Green Monster claims are not prospects, but rather patented claims;
2. These claims have been actively worked continuously for the past 17 years. The comment that the site "... was explored as late as 1972..." is not up-to-date and should be deleted;
3. The statement regarding 'access and staging' was correct 50 - 80 years ago, but not today. Would suggest deleting the statement;
4. The statement on the claims' 'low potential for extensive mineral development' is not very relevant. Instead, what is important is that the claims are being actively worked, and are expressly closed to trespass, and
5. The present draft reads like an open invitation to come and explore, which is not acceptable to Doug or me. We urge you to revise the draft to clearly indicate that these claims are privately owned and closed to public access for the purpose of mineral collection or prospecting.

By all means give me a call at 789-0637 for any further information, or if you wish to discuss our claims in any further detail. I would be glad to review any redrafts, and my fax number is 789-9487.

Thank you for your consideration.

cc: Douglas C. Toland

*Sincerely yours,*  
*Tom Hanna*

AM-1 The suggested changes have been incorporated into the appropriate places in the EIS.



**TONGASS CAVE PROJECT**  
A PROJECT OF THE NATIONAL SPELEOLOGICAL SOCIETY

Forest Supervisor  
Ketchikan Area  
Tongass National Forest  
attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK 99901

Dave Arrasmith  
Tongass National Forest  
attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK 99901

Kevin Allred  
Box 376  
Haines, AK 99827  
October 21, 1993

TCP-1

See response to ADFG-39.

Dear Mr. Arrasmith and Mr. Rittenhouse,

In looking through the draft Polk Inlet EIS, I noticed some references to a couple of potential units containing possible cave and karst resources in a some of the proposed units. The geologic map shows slivers of marble located south of Twelve Mile Arm and possible marble deposits further east in the study area.

Could you possibly get us more information of where all possible carbonate units are located? The Tongass Cave Project would like to help look them over if able. I plan on being out of state during the review process, so the best bet is to send the information to Pete Smith, Box WWPP, Ketchikan, AK 99950. I'm sending a copy of this letter to several other interested parties who have copies of the EIS draft in the hope that they can also help in some way.

Leafing through the Unit Cards I identified proposed units with the following descriptions: #624-230, some minor solution features at east end of unit, but no true caves were found. #674-211, Schist/limestone and quartz outcrops with "chaotic collapse terrain abundant". unit dropped. #675-209, "Joint controlled drainage in siliceous carbonate rock". #675-210, solution features present. #675-228, solution features, small cave-like openings, large cracks occur throughout cliffs on ridgetop above unit. 3 caves were seen along boundaries, 2 were large enough to enter. NW border had water running out 1-2 CF/min.

With these descriptions, it appears that the alternatives have the following numbers of units containing karst or cave resources: #1 has zero, #2 has at least one, #3 has at least 4, #4 has at least one, and #5 alternative has at least one. I feel that these units (and others containing or upstream of significant karst perhaps not be mentioned in the unit cards) should be carefully inventoried and if necessary, studied hydrologically for underground systems before being considered for timber harvest.

Sincerely, Kevin Allred, Tongass Cave Project Co-director.

cc: Pete Smith, Rob Knotts, Marcel LaPerriere, Judy Brakel, Steve Lewis, Mark Fritzke.

TCP-1



## Comments of the Southeast Alaska Seiners



[ ] Ketchikan Office  
P.O. Box 9579  
Ketchikan, AK. 99901  
phone: (907) 225-5156  
fax: (907) 225-5258

November 23, 1993

David Rittenhouse  
Tongass National Forest  
Attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK. 99901

Dear Mr. Rittenhouse,

On behalf of Southeast Alaska Seiners (SEAS) which has a membership of over 400 commercial fishermen, I am submitting these comments to strongly urge you to select a modified Alternative 5 for the Polk Inlet DEIS. After reviewing the summary analysis, Alternative 5 is preferable for these reasons:

- |        |  |
|--------|--|
| SEAS-1 | 1) Alternative 5 does not require any more LTF's in Cholomodeley Sound. As you may know, Lagoon and Disappearance Creek (both drain into Cholomodeley Sound), provides for Southeast's primary fall seine fishery which this year proved to be critically important for 40 to 50 seiners trying to make ends meet in another year of low salmon prices. Over the last few years, the fall chum season has come to represent a "make it or break it" fishery for many seiners; hence the growing number of seiners.   |
| SEAS-2 | 2) Alternative 5 has fewer acres of riparian harvest than Alternative 3 and 4. Given the large extent of past riparian harvesting within this area, it is crucial that as much of the remaining riparian areas be maintained for protection of fisheries values. ADF&G, in their comments, makes specific note of how extensive the riparian habitat harvesting has been in the past: "We are concerned that approximately 14% (3,730 acres) of the riparian zones in the Project Area have previously been harvested and that some watersheds have already lost up to 72% of their riparian buffers (Table 3-14)." These errors of the past must be considered today through adequate watershed analyses prior to any more riparian harvesting. |
| SEAS-3 | 3) Alternative 5 has the fewest stream crossings. But I must concur with ADF&G's request to employ timing windows for culvert installations or other instream work within Class II streams. This could greatly minimize sedimentation of downstream anadromous spawning habitat.   |
| SEAS-4 | 4) Alternative 5 requires the fewest miles of road construction.<br>5) Alternative 5 still generates economic return (jobs and timber value) c comparable to all other alternatives.   |
| SEAS-5 | You will note that SEAS supports a "modified" Alternative 5. The major need for modification is to greatly minimize the amount of logging on steep slopes and unstable soils. Given the amount of landslides during this fall's deluge, I would expect the Forest Service to be particularly sensitive to this concern. ADF&G's comments documented that units which were once recommended to be deleted by field personnel are now designated for clearcutting. Likewise, units that were once recommended for helicopter logging are now proposed for conventional cable yarding. Shouldn't you at least being following these   |

## Responses to the Southeast Alaska Seiners

SEAS-1	Comment noted.
SEAS-2	Comment noted.
SEAS-3	Comment noted.
SEAS-4	Comment noted.
SEAS-5	Refer to response ADFG-5 and SEAC-26.

[x] Juneau Office  
9226 Long Run Dr.  
Juneau, AK. 99801  
phone: (907) 789-5117  
fax: (907) 789-5117

## Comments of the Southeast Alaska Seiners

SEAS-5 recommendation for units with steep slopes and unstable soils?

(cont.)

I am also greatly concerned that you intend to log on slopes greater than 75% even though the Draft TLMP directs otherwise. As such, I strongly encourage you to re-evaluate Alternative 5 to ensure that the 27 units (referred to ADF&G's comments) having very steep slopes and instability problems are either deleted or slated for helicopter logging only.

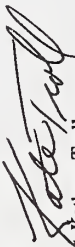
SEAS-6

The other essential need for modification relates to riparian management. Please require all 100 foot buffers to be measured horizontally, rather than slope distance, as this is the intent of Tongass Timber Reform Act. Additionally, please reinstate buffers wider than 100 feet for those channel types previously identified in the 1989-94 EIS as needing more than 100 feet to maintain riparian values. Tongass Timber Reform Act intended the 100 foot to be a minimum for Class I streams, not a maximum. As noted above in #2, watershed analyses should occur prior to any more riparian harvesting for those watersheds that have extensive past riparian harvests.

SEAS-7

These comments are respectfully submitted in the interest of promoting multiple use and compatibility between the fishing and timber industry. Thank you for the opportunity to comment. Should you desire more information or have questions please call.

Sincerely,



Kathryn Troll  
Executive Director

c.c. SEAS Board of Directors  
ADF&G Division of Habitat - Ketchikan Office

## Responses to the Southeast Alaska Seiners

SEAS-6

In a June 14, 1994 letter to the Forest Supervisors, the Regional Forester has committed the Region "...to ensure that future stream buffers will not be less than 100 feet measured horizontally in order to protect riparian habitat." This requirement is not to apply to existing layed-out units. An April 4, 1994 letter from the Ketchikan Area Forest Supervisor to the District Rangers, clarifies that all units layed out after December 27, 1993 will meet this direction. Consequently, the final lay out of Polk Inlet Project harvest units will use the 100 feet horizontal measurement. This requirement only applies to class I streams and class II streams that flow directly into a class I stream. All other stream buffers will continue to be measured by slope distance. Appendix C-2 documents buffers prescribed for the Polk Inlet Project Area. Note that a large part of the reason that the 100-foot required buffer was included in TTRA is because of the National Marine Fisheries Service (NMFS) policy for riparian management in Alaska. The policy states that 30 meters is the minimum width required to provide shade and future sources of large woody debris. The data for this recommendation comes, in part, from a NMFS study, under contract to the Forest Service, "The Relationship between Stream Classification, Fish, and Habitat in Southeast Alaska" (Tongass National Forest Publication R10-MB-10, March 1987) which analyzed the distance to the stream from which woody debris originates. This study showed that over 90 percent of the large woody debris comes from within 100 feet of the stream. The data on which these recommendations were based were collected using slope distance. The difference between the two methods is insignificant in most cases.

SEAS-7

Refer to response ADFG-33 and ADFG-34.

## Comments of Judy Brakel

Gustavus, Alaska  
Nov. 18, 1993

Forest Supervisor, Ketchikan Area  
Tongass National Forest  
Attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK 99901

Dear Forest Supervisor:

This is my comment on the Polk Inlet Draft EIS.

I favor Alternative 1, the No Action Alternative, because there has already been too much cutting and roading on Prince of Wales, including in the Polk Inlet project area.

The EIS should have been used to determine what was an appropriate level of cutting, instead of starting with a pre-determined level of 125 million board feet and using the EIS process merely to determine how to distribute it.

The following comments apply to alternatives other than Alternative 1.

Perhaps I did not know where to look, but I could not find where logged Native lands were included in considerations of cumulative impacts on wildlife, fisheries, recreation, scenery, etc. I believe that NEPA requires including logging in non-Forest Service lands in these considerations.

The proposed cut exceeds sustainable yield. ASQs based on TLMP allowable cut estimates are heavily inflated beyond realistic levels. Note the contrast between the two ASQs derived for the adjacent timber CPOW project, one based on TLMP and another on the MELP done by the interdisciplinary planning team.

The proposed alternatives do not meet Tongass Timber Reform Act requirements for proportionality.

The alternatives other than #1 do not provide for community economic stability. A high level of cut will proceed until the timber supply begins to run out, requiring a sudden steep decline in timber-related employment. Moreover, there will not be enough high quality timber left for small scale, value-added timber based businesses.

The cumulative reductions estimated for wildlife habitat are unacceptably large. For example, by the year 2054 an estimated 54% reduction will have occurred in deer habitat, and a 60% reduction in suitable deer harvest. These estimates, moreover, are based on our present understanding, doubtlessly flawed, of wildlife habitat requirements. ADF&G's deer population objectives for the area will not be met. Areas previously identified as "old growth retention" and "extended rotation" are slated to be cut, despite the fact that these areas were carefully identified in cooperation with the Dept. of Fish & Game, with the understanding that at least the old growth retention areas would be long-term set-asides to provide for wildlife habitat.

The quantity of roads already built on Prince of Wales is detrimental to wildlife, as shown by

## Responses to Judy Brakel

Refer to response to ADFG-39.

Consideration was given to past and future logged Native lands throughout the DEIS in the cumulative effects subsections of each section (e.g., see page 90 under Wildlife in Chapter 4). In addition, past and future logging on Native lands was given consideration in the development of alternatives (see the items common to the alternative frameworks on pages 3-5 under Development of Alternatives in Chapter 2) and mitigation measures (see pages 34-35 under Mitigation Through Avoidance of Geographic Areas in Chapter 2). Further refinements have been made to the analysis of cumulative effects in the FEIS.

Refer to response to NCC-9. Additionally, please note that the TLMP is currently undergoing revision and information produced by recent project-specific EIS's will be considered. Also please note that the CPOW MELP should not be used for the purpose of calculating ASQ. As noted in the CPOW ROD (p. 8) and FEIS (p. 3-112), the CPOW MELP is a short-term assessment of potential harvest units, based in part on "relatively low risk to environmental concern units" and project (or current) economics.

Refer to response to ADFG-9.

Effects on community stability are analyzed in the Economic and Social Environment section of Chapter 4. The EIS concludes that Alternatives 1 and 1a would have the greatest negative effect on community stability in the short-term. In the long-term, the EIS concludes that the sustainability of timber harvests depend on improving economic conditions and/or improved or more efficient logging systems. It also depends on the assumption that no new land use allocations are made in the future that would reduce the timber base.

Comment noted. Also please refer to response to ADFG-4.

Comment noted.

JB-1

JB-2

JB-3

JB-4

JB-5

JB-6

JB-7



## Comments of Judy Brakel

JB-7  
(cont.)

the effects of roads on marten. I was also "grossed out" recently when the radio reported that Prince of Wales was to receive disaster relief funds because the quantity of roads, coupled with the amount of logged-off land plus a heavy rain, resulted in landslides damaging a number of roads. I believe the construction of additional roads will be detrimental to the taxpayers as well as to wildlife, wilderness recreation, etc.

JB-8

The cost of "road credits" is not included in the costs of the timber sale. If those were included it would be seen that this is another subsidized or "give-away" timber program.

JB-9

Concerning karst lands and caves, the study conducted for the DEIS was inadequate. No cutting or road building should be allowed in or near karst areas until procedures recommended by the Blue Ribbon Karst Panel are followed: hydrological systems mapping and vulnerability mapping. All areas designated by this process as "high vulnerability" should remain off limits to cutting. The mitigation proposed in the DEIS is entirely inadequate. I request that the report of the Blue Ribbon Karst Panel and the report Cave Lands of Southeast Alaska, an Imperiled Resource (Streveler and Brakel, Feb. 1993) be made part of the planning record.

JB-10

Effectiveness of mitigation methods proposed for karst lands, wildlife, fisheries and other resource values is unknown because the Forest Service has not conducted effectiveness monitoring in past timber sales/roadings.

Thank you for attention.

Yours truly,

*Judy Brakel*  
Judy Brakel

Box 94  
Gustavus, AK 99826

## Responses to Judy Brakel

JB-8

The construction of specified purchaser credit roads is paid for by the timber operator as part of its cost of purchasing the timber. The roads provide an asset to the government. The costs of specified roads are accounted for through the use of purchaser credits rather than deducting road costs as a logging cost (as for non-specified roads). The mid-market assessment in the EIS treats all road construction as a harvest cost.

JB-9

Refer to response to ADFG-39.

JB-10

Comment noted.

Comments of Michael Chapman

November 10, 1995

David Armstrong, Planning Officer  
USDA Forest Service  
Federal Building  
Ketchikan, Alaska 99901

Dear Sir:

I am writing to you about the Polk Inlet Draft Environmental Impact Statement. I am listing below my comments.

MC-1 PAC FISH potential new information

With PAC FISH evolving in the lower 48 states, and the manner in which the Alaska section of the Forest Service has to show why it should be exempt from PAC FISH, I think that this and any new EIS processes made during the 1 year period of self examination should include sufficient study to indicate why it should also be exempt. At minimum, an alternative which examines as close a PAC FISH regulation as possible should be included in the EIS and results published. As you go into the future I can't believe that the possibility of a PAC FISH type regulation is not in your "possible future".

MC-2 TIERING TO TLMP

I have been watching the way the tiering to TLMP. I understand that in February of 1995 the draft was sent to your superiors at Washington D.C. for approval and examination. It has not returned and I have heard rumours of it being considered "dead". Since alot of the EIS depends on an unpublished, not approved, DRAFT TLMP, I would think that you should then abandon your attempts to link any findings which are not approved by your "head office". You should be trying to work exclusively on making the EIS 1979a compatible with the original TLMP, one they approved and published plan. This will allow your management philosophy and approach, but will be legal.

MC-3 REAPPRaised ASQ

Now that the Sida basin APC has closed, the requirements of the Tongass National Forest has been changed. Your original assumptions regarding Supply and Demand are now invalid. This change makes your Available Sub Unitary to be admitted to compensate for the lessened demand. This should allow you to decrease logging activity throughout the Tongass in a more equitable manner to fulfil your remaining legal obligations to the KPC. This means that your purpose and need are now invalid, since the demand was to be fulfilled in the POW area. Areas previously allocated to APC are now up for grabs for KPC and you should take advantage of this additional supply elsewhere to fulfil your needs.

MC-4 AFFECTS ON SUBSISTANCE

It is entirely possible that the USDA Forest Service will begin to manage Fisheries activity off state lands due to court actions in the near foreseeable future. Your role and reliance on the state to manage subsistence

Responses to Michael Chapman

MC-1 Refer to response to SEAC-8.

MC-2 You are correct in stating that the TLMP has not been revised as of this writing. Therefore, the actions analyzed in this EIS are designed to implement direction in TLMP (1979a, as amended). Further, these actions are also designed to be consistent with the preferred alternative of the TLMP Draft Revision Supplement (1991a). See Chapter 1 of the DEIS or FEIS for additional explanation.

MC-3 This is a Forest Plan-level decision and beyond the scope of this project level-EIS.

MC-4 Because of an upcoming (as of this writing) ruling on a now-combined case (*John vs. United States/Alaska vs. Babbitt*), navigable rivers may be required, under the Alaska National Interest Lands Conservation Act (ANILCA), to be managed by the federal government instead of the State of Alaska. The ultimate question being decided is "does the rural preference in Title VIII of ANILCA apply to fisheries in navigable waters?" The nature and form of any changes in management that could occur, however, are not certain as this EIS goes to print. Although the Forest Service is currently considering the ramifications of this change, what effect the change would have on subsistence use in the Polk Inlet Project Area, if any, is not clear.

Comments of Michael Chapman

MC-4 has to be reexamined and federal standards levels established for substance levels and requirements made for rail substance users. Simply reporting possible effects is not enough. You need to list detailed plans for how the substance activity will be managed for the area ON ATLEAST FEDERAL LANDS. New levels within your project area need to be established in writing and submitted.

Michael Chapman  
  
 P.O. Box 8935  
 Ketchikan, Alaska 99901

Responses to Michael Chapman



Comments of Donald Dinsmore

11-17-93

Responses to Donald Dinsmore

DD-1

Comment noted

Dear Dave

DD-1

I am being asked to fill out a form (see enclosed) and send it off to you.

The problem is I would not know what I'm signing or disagreeing with.

All I know is that I work for Ketchikan pulp co & have for more than 26 years. And if it were to close down, the effect on the community and my family would be devastating.

I hope there is a reasonable way to settle this once & for all & fair to all sides.

Good luck to you.

Sincerely  
Donald O. Dinsmore

Box 1400 Wind Cove AK 99925



ALABAMA STATE SENATE  
ALABAMA STATE HOUSE  
MONTGOMERY, ALABAMA 36130-4600

October 27, 1993

ALABAMA

FRANK "BUTCH" ELLIS, JR.  
STATE SENATE 14TH DISTRICT  
P.O. BOX 587  
COLUMBIA, ALABAMA  
36501  
(205) 668-4783

Forest Supervisors  
Ketchikan Area  
Tongass National Forest  
Attention: Polk Inlet EIS  
Federal Building  
Ketchikan, Alaska 99901

Dear Sir:

I am writing with my comments concerning the Draft Environmental Impact Statement (EIS) for the Polk Inlet Project Area. I thank you for your consideration in forwarding the documents to me.

FE-1

Although my family and I are interested in the environment of all Southeast Alaska, our principal concern is Cholmondeley Sound, Prince of Wales Island. My wife and I built a cabin on Cannery Creek, West Arm Cholmondeley Sound in 1988. We still have that cabin there. We visit the cabin for extended periods at least twice a year and it is involved heavily in our retirement plan. With respect to Cholmondeley Sound, we have already seen the forest and environment damaged severely by actions of the native corporations in and around Dora Bay. When we first visited this property years ago, Dora Bay was one of the most pristine and beautiful places in Alaska. Look at it now! Another native corporation has procured through political action the land around Sulzer Portage and the other remaining most beautiful spot in Cholmondeley Sound -- Lagoon Creek (at the end of the West Arm). I am afraid that the land given to the natives at the end of the West Arm will end up devastated as was the land around Dora Bay and Divide Head.

How much more damage can we possibly sustain in Cholmondeley Sound? In the defense of the Forest Service, we have noted that the Forest Service timber cuttings are much less damaging to the environment and are generally conducted in a manner more consistent with retaining the biological and environmental diversity of the land. I would not insult you by comparing forest service activity to that of the native corporations in the area. We are, however, still very much concerned about the environmental impact of the Forest Service plan in an area already heavily damaged by native corporation activity. We are also concerned about the specific impact that the proposed activity would have on Cannery Creek in the West Arm.

FE-1

Comment noted.

COMMITTEES:  
CHAIRMAN, JUDICIARY/CRIMINAL JUSTICE  
VICE CHAIRMAN, PUBLIC WELFARE  
CHAIRMAN, NATURAL RESOURCES  
GOVERNMENTAL AFFAIRS/LOCAL  
GOVERNMENT  
GOVERNMENT  
CONSTITUTION AND ELECTIONS

## Comments of Frank Ellis, Jr.

Forest Supervisors  
October 27, 1993  
Page Two

FE-2 I note that "Alternative 4" provides for a logging road along the East bank of Cannery Creek. This alternative also provides for a log transfer facility in the vicinity of Lot 14. My wife and I own Lots 12, 13, 14, 1, and 2 Cholmondeley Sound Subdivision, Plat No. 85-35, Ketchikan Recording District. This logging road and the timber transfer facility would be very damaging to our property as well as one of the few remaining old growth areas.

FE-3 To be quite honest, I guess we oppose any further timber cutting or development in Cholmondeley Sound. I know this may not appear realistic, but the activity of the native corporations has dealt this entire eco-system a devastating blow which is about as severe as I think it should have to endure. The timber activity in and around Dora Bay and Divide Head has resulted in much floating debris in the water. Our annual sightings of humpback whales and other wildlife have diminished considerably. In the mid- and late '80's the humpback whales ranged on a regular basis all the way in to the West Arm in the vicinity of Lagoon Creek. The whales now tend to stay out near the mouth of Cholmondeley Sound and rarely come in. We have seen all timber cut around active eagle nesting trees, leaving no wind buffer or barrier, only to find these trees blown over or destroyed the next year. I point out video film was made of one of these eagle's trees which was destroyed at Divide Head. The video was given to either the Forest Service or Alaska Fish and Game. Trees have been cut into salmon streams -- the list goes on!

I feel certain that the forest and its environment which was destroyed by the native corporation in Cholmondeley Sound will never be the same. I know that the trees will return, but it would appear obvious that it will be a different forest indeed.

My hope and prayer would be that all the remaining old growth forest in Cholmondeley would be left alone as sustaining pockets of wildlife and environmental diversity to feed the recovery efforts of those tracts which have been ceded to the native corporations. There does not appear to be much old growth forest left and when you propose roads and logging transfer stations to reach the very small residue which does remain -- such as Cannery Creek, it seems that we are over-harvesting. Can we not save some of this old growth?

In conclusion, I know that the Forest Service cannot be blamed for the excesses of the native corporations in Cholmondeley Sound. I do think, however, that the Forest Service has the responsibility to preserve the few old growth forests which are left in Cholmondeley Sound in order to avoid further damage to the environment and to provide a source for organisms great and

## Responses to Frank Ellis, Jr.

FE-2 Comment noted.

FE-3 Comment noted. The cumulative impacts of logging on National Forest System land and adjacent native corporation land have been considered in the development of alternatives (see Chapter 2), in the assessment of the effects of the alternatives (see Chapter 4), and in the selection of a preferred alternative (see Chapter 2). Please note that the preferred alternative avoids harvesting in the Cholmondeley Sound area.



Comments of Frank Ellis, Jr.

Forest Supervisors  
October 27, 1993  
Page Three

FE-3 (cont.) small which will be necessary to sustain a rejuvenation of the tracts which have been so damaged by the native corporation activity.

We thank you for all you do to protect the Tongass National Forest and hope that you will do all you can to protect the beauty and diversity of this wonderful place.

With every good wish, I am

Yours very truly,



Frank "Butch" Ellis, Jr.

FE:ph

Responses to Frank Ellis, Jr.

KF-1

Comment noted.

Dear Mr. Rittenhouse:

I agree with everything in this letter. Let me tell you why. I worked for 20 years for Champion Building Products in Mapleton, Colo. The Spruce Out and about 65% of the U.S. Forest land the Lincoln National Forest.

I have worked here in open good state of Alaska now for 8 years. I worked for Gilchrist Logging for the first 3 1/2 years on POW. Then I came up to Juneau and went to work for APC.

Now we are out of a job as of 11-19-83 because the F.S. & APC don't get along.

What I would give my left hand it did for me to see APC, Weyerhaeuser Co., C.B.P., Georgia Pacific & any other pulp company & close their doors for 3 months

KF-1

Comments of Kent FravendeinuKF-1  
(cont.)

You and Me wouldn't have the paper to read this on, no X-mas paper to wrap your present in, no paper racks or boxes to put your opinion in at Safeway let alone the paper labels on the can goods, ice cream & whatever, not to mention the toilet tissue. Maybe since you people want the loggers out of business, you can go get cones to use in your bathroom. You sure will have the time with none of us working.

Kent A. Fravendeinu  
P.O. Box FAK  
Sitka, AK.

99835

Please send your comments to:

Kent A. Fravendeinu  
05803 Mercer Lake Road  
Thorne, Oregon  
99835



# Comments of Owen Graham

November 24, 1993

Mr. David Rittenhouse  
Forest Supervisor  
USDA Forest Service  
Ketchikan Area  
Tongass National Forest  
Federal Building  
Ketchikan, Alaska 99901

Re: Comments on Draft Environmental Impact Statement for Polk Inlet

Dear David:

Thank you for the opportunity to comment on the Draft Polk Inlet EIS. In general, I prefer Alternative 4. I also have the following comments:

- |      |  |      |                |
|------|--|------|----------------|
| OG-1 | 1. Wildlife will not be harmed under any of the alternatives. Some habitat may be changed from "old growth" to "young growth" and that change would benefit certain species and discourage others, but timber harvest affects such a small portion of the Tongass, even on a long-term basis, that there is no need for concern. This is especially true when you consider that the "most valuable" habitat areas have already been set aside in wilderness and roadless designations, buffer strips, etc. | OG-1 | Comment noted. |
| OG-2 | Further, there is no need to maintain additional "unfragmented blocks" of timber when 2/3 of the commercial forest land on the Tongass is already set aside. The alarmist, scare tactics being used by overzealous biologists and preservationists should not be allowed to displace decision making from forest managers to people who are not trained to judge the merits of various alternatives.   | OG-2 | Comment noted. |
| OG-3 | 2. Fish habitat and water quality will not be impaired by any of the alternatives. On the contrary, recent studies have shown a tremendous increase in fish production in areas that have had timber harvest, especially when that harvest utilizes the current Best Management Practices.   | OG-3 | Comment noted. |
| OG-4 | Also, populations of fish, birds and marine mammals all seem to increase when log storage or float camps are brought into an area. Further, I have dived numerous log transfer and storage areas and have noted that bark deposition is extremely localized, and at sites that transfer less than about 40 MMBF per year the bark decomposes before it accumulates enough to significantly affect plants and animals growing on the bottom.  | OG-4 | Comment noted. |
| OG-5 | 3. There is very little subsistence use of this project area. I have spent much time flying around this area and very rarely see any people, skiffs or other indication of use of the area other than timber harvest. In any case, deer populations have increased following logging.  | OG-5 | Comment noted. |

# Responses to Owen Graham

## Comments of Owen Graham

Mr. David Rittenhouse  
November 24, 1993  
Page 2

OG-6 | 4. It is essential that this EIS be completed without delay in order to help alleviate the critical fiber supply shortage facing the timber industry at this time.

OG-7 | 5. It is also essential that the final ROD results in timber sales that are cost effective so that the timber industry has an opportunity to be profitable.

OG-8 | 6. Visual quality should not be a concern because 2/3 of the commercial forest land on the Tongass is already set-aside from timber harvest and much of these set-asides are in "wilderness" and "roadless" area designations that provide ample opportunity for "primitive" or "natural" scenic beauty. Also, I have noted that most people seem to prefer very large "drainage cuts" over "small patch cuts" because the "patchwork" effect lasts indefinitely while the visual impact of large cuts is gone in a very few years when the harvested area has "greened up". The lack of contrast between young growth and old growth tree heights with patch cuts is the obvious reason for this.

OG-9 | 7. Caves can be adequately protected by utilizing common sense and a little care around cave entrances and drainages into caves. I have inspected caves after timber harvest has taken place around them and have seen no impact where care was taken and very little impact in areas that were logged before "sinkholes" were regarded as a concern.

OG-10 | 8. Mud slides occur naturally as a geologic process. The frequency of mud slides increases somewhat immediately following timber harvest, but the severity is usually less than what it would be if the area was left to become more and more unstable and an infrequent but catastrophic slide occurred. There are many examples of this I could point out if you wish. Over a longer time period there is no overall increase in slide activity. All hills and mountains are eventually eroded down by natural processes. Also, the slides that do occur tend to happen during severe storm events and sedimentation is either deposited very close to the end of the slide (in the case of large particles of sediment) or are carried all the way to the ocean (in the case of fine particles of sediment). This is more the case in Southeast Alaska than the rest of the Pacific Northwest because the streams in Southeast Alaska are generally high energy, short length streams.

OG-11 | 9. I think the Forest Service has gone much too far in maintaining "proportionality". The current methods of determining and maintaining "proportionality" are resulting in timber sales that do not have enough value or volume to pay for the mobilization and road construction costs. The Forest Service should measure proportionality over a rotation as the TTRA states and the measure should include all the timber in an area, including timber locked away in buffer strips and other such set-asides.

## Responses to Owen Graham

OG-6 Comment noted.

OG-7 Comment noted.

OG-8 The visual resource is one of the basic resources, such as soils, water, timber and wildlife, considered in forest management. Whereas the visual resource is not typically managed in designated wilderness and roadless areas, it is managed from key view points and travel routes identified by the U.S. Forest Service.

The maximum size of cutting units is stated in the forest plan and the National Forest Management Act and is based on multiple resource considerations.

OG-9 Refer to response to ADFG-39. Additionally, comment noted.

OG-10 Refer to response to ADFG-5. Additionally, comment noted.

OG-11 The maintenance of proportionality is legally mandated by the Tongass Timber Reform Act. Our procedures for implementing it represent our best interpretation of the intent of the Act.

Comments of Owen Graham

Mr. David Rittenhouse  
November 24, 1993  
Page 3

- OG-12

10.

Many of the stands of timber we are harvesting economically today were uneconomic to harvest only 10 years ago. Harvest practices and technology continue to improve rapidly, consequently, the Forest Service should not be overly concerned about postponing harvest of economically marginal stands until a future time when economics of manufacturing forest products and economics of harvesting timber will be more advanced.
- OG-13

11.

The Forest Service should continue to manage the entire Tongass for sustained yield rather than try to manage sub-units of the Tongass for "sustained yield". A large percentage of people on Prince of Wales Island are commuting to remote areas to build roads and harvest timber. Of course they would prefer to be able to drive home each evening, but living away from home a few days at a time or relocating to another area in Southeast Alaska is preferable to not having a job at all.
- OG-14

12.

The Forest Service should not put too much reliance on unverified models such as the one I understand ADF & G uses to predict declines in deer populations following timber harvest. The fact that deer populations and fish populations continue to increase after 40 years of commercial timber harvest indicates that fish and wildlife habitat are not being impaired.
- OG-15

13.

In chapter 2, page 35 the DEIS says timber harvest was deferred in an area because of visual impacts from private land harvest nearby. The current timber sale program level (420 MMBF/year) is already too low to sustain the existing manufacturing industry. There is enough land set aside already - 90% of the land and 2/3 of the commercial forest. The areas not already set aside should be managed intensively for supplying timber to the dependant industry.
- OG-16

14.

It is wrong to characterize the Ward Cove pulp mill as a "large air pollution source." That statement simply is not true; Please contact KPC if you need to be convinced they do not pollute the air or water.
- OG-17

15.

Fish kills from low water and low dissolved oxygen result from too many fish in the streams. The effect of increased temperature on this phenomenon is negligible.  
  
Stream temperatures on Prince of Wales Island have not been found to even approach lethal levels and are often below optimum for fish production. Anchor ice is a very minor phenomenon and timber harvest is just as likely to reduce anchor ice as to increase it. Please clearly outline this in your affected environment section. The current text dwells almost entirely on potential negative impacts of timber harvest.

Responses to Owen Graham

- OG-12

The economics of timber harvest is a factor evaluated in this EIS by geographic area and alternative. Analyzing less economic stands and areas provides valuable feedback to the Forest Planning process and facilitates a more informed decision-making process for this Project.
- OG-13

No attempt has been made to evaluate sustained yield within the Polk Inlet Project Area. This is a Forest Plan-level exercise and beyond the scope of a project-level EIS.
- OG-14

Comment noted.
- OG-15

In analyzing the cumulative impact on the visual resource from management activities, the conditions on lands adjacent to National Forest System lands must be considered according to visual guidelines in the forest plan.
- OG-16

In Chapter 3, Climate and Air Quality, the Ketchikan Pulp Company mill at Ward Cove is recognized as a local source of airborne particulates. In Chapter 4, Air Quality, it is stated that the action alternatives would supply raw wood products to the mill; that this would indirectly affect air quality in the vicinity of Ketchikan; and that it is KPC's responsibility to ensure that emissions from the mill are within legal limits. The Ward Cove pulp mill is not characterized as a large air pollution source. The general reference to pulp mills as large air pollution sources has been revised.
- OG-17

Comment noted.



## Comments of Owen Graham

Mr. David Rittenhouse  
November 24, 1993  
Page 4

- OG-18 | Also, the LWD and slash discussion on pages 34 and 35 of chapter 3 talk only about buffers vs. no buffers and slash in Class III streams vs. no slash. The real issue is how large a buffer and how much Class III stream protection and post logging chunk out.
- OG-19 | 16. It is good that the Forest Service recognizes a potential for increased fish production (pages 37-40, chapter 3).
- OG-20 | 17. The cable yarding section (pages 64-66, chapter 3) completely overlooks mobile swing yarding and talks of running skyline only with a tower. The mobile swing yarders are much safer for yarding crews, more cost efficient, they eliminate most debris piles at landings because they do not usually use landings, they cause much less ground disturbance than towers (even though they are shorter) because they take only one log at a time and they can be used in areas that have inadequate guyline anchors for towers.
- OG-21 | 18. Table 3-18 appears to be missing the period of 1983-1986.
- OG-22 | 19. The volumes per acre in table 3-23 appear unreasonably high. Current units being logged in this area contain about 1/2 these volumes per acre.
- OG-23 | 20. Every animal and plant species is less abundant at the extreme edges of its range. Species should be treated as threatened or endangered only when it is threatened or endangered over its entire range, not in one specific site or area.
- OG-24 | 21. Forest "interior-dwelling" species are not necessarily preferable to "edge-dwelling" species (page 10, chapter 3).
- OG-25 | 22. Please indicate which plant and animal species will be more abundant after timber harvest.
- OG-26 | 23. Please indicate what percentage of annual installed manufacturing capacity would be sustained by this EIS.
- OG-27 | 24. The economic analysis should have added about \$100/MBF to "Method 1" helicopter logging, not the \$50/MBF indicated on page 131, chapter 4.
- OG-28 | 25. The summary on page 162, chapter 4 is wrong. There is lots of wilderness only a short drive or boat ride from Hollis and deer populations will likely continue to increase around Hollis. It is wrong to indicate Hollis resident subsistence would be significantly restricted.
- OG-29 | 26. Please insure that the mitigation measures on pages 212-214 do not result in unit layout crews ignoring road costs, deflection, guyline and tailhold anchors, etc.

## Responses to Owen Graham

- OG-18 | Comment noted.
- OG-19 | Comment noted.
- OG-20 | The cable yarding section has been revised in the FEIS to address mobile swing yarding.
- OG-21 | The 1983-1986 period is not included in the table because no timber harvest occurred on currently nonencumbered National Forest System lands in the Polk Inlet Project Area during that period.
- OG-22 | Timber volumes were based on systematic cruises of sample units. About one sample plot was established for every 10 acres in each harvest unit.
- OG-23 | Comment noted.
- OG-24 | The discussion on page 110 of Chapter 3 does not suggest that forest interior-dwelling species are preferable to edge-dwelling species, but that because of increasing timber harvest, interior-dwelling species are continuing to decline in abundance. Research indicates that once fragmentation of forest habitat exceeds a threshold level, interior-dwelling species may completely disappear from blocks of remaining habitat.
- OG-25 | It is recognized that some plant and animal species will be more abundant after timber harvest. A description of plant succession following logging, including those species that increase in abundance, is presented under Plant Succession in the Cumulative Effects section of the Vegetation and Timber Resources section of Chapter 4. Although several species of birds and mammals will increase, at least temporarily, following logging, these species are generally those adapted to early successional or edge habitats and are not of major concern because of the increasing availability of their habitats. The analysis in this EIS focuses on threatened, endangered, and sensitive species and the Management Indicator Species of the Forest.
- OG-26 | Appendix A of the DEIS on page A-2 addresses this point by describing the obligation of the Forest Service to provide a 3- year supply of timber to KPC. This 615 MMBF requirement on an annual basis means that the Forest Service seeks to supply 205 MMBF each year. The Polk Inlet timber sale volume is 125 MMBF or 61% of one years commitment.

Comments of Owen Graham

Mr. David Rittenhouse  
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Page 5

OG-29  
(cont.)

Currently, many units are nearly impossible to yard as initially laid out because the layout work is redone or directed by other "specialists" that are not qualified to design timber sale units for harvest. The specialists concern should be input only, and Rangers and layout crews should have the authority and willingness to overrule specialists when necessary.

OG-30

27. Pristine areas are abundant around the project area, consequently this concern should not limit any timber harvest. A partial list of these areas include:

Area	Accessibility
Karta	Boat (from east), road (from west), plus float plane access
Sarkar	Boat, road and float plane access
Calder/Holbrook	Boat, road and float plane access
S. POW Wilderness	Boat and float plane access
Old Tom's Place	Boat and float plane access
Plus many million acres accessible with a 1/4 to 2 hour float plane ride.	

OG-31

28. The Forest Service should take every opportunity to increase clearcut size to improve recovery (MMBF) per mile of road built and to reduce blowdown potential around clearcut boundaries (bigger clearcuts means relatively fewer boundaries).

OG-32

29. Please do not allow the rock pit spacing policy to get out of control as it did on the Thorne Bay Ranger District the last few years. The cost increase on roadbuilding is devastating when rock haul is increased by rock pit spacings.

OG-33

30. As part of your implementation monitoring please monitor for cost effectiveness of final unit layout. Hopefully this will help insure economics is considered along with other concerns as the cutting lines and road locations are marked on the ground.

I also have the following comments regarding some of the individual cutting units in alternative:

OG-34

1) Combine Units 612-202, 204 creating one larger unit to improve economics. If not feasible to combine then units should be enlarged.

OG-35

2) Unit 612-207 should be expanded to the north and west. Also the estimated volume per acre is high.

OG-36

3) Enlarge Unit 612-213 along south end above road to make a logical and safe setting.

Responses to Owen Graham

OG-27

The discussion on page 131 already addresses this comment by describing the purpose of adding \$50 per MBF to the helicopter logging costs as an attempt to test the sensitivity of the alternatives to an increase in yarding costs. This table was not intended to represent a current appraisal. The purpose of the table was to show the mid-market assessment for the project alternatives as directed in the Forest Service Handbook 2409.18 (Sale Preparation), R-10 Supplement No. 2409.19-91-1. This R-10 Supplement requires that factors used in calculating the estimate of timber values must be based on the Regional mid-market timber values and logging costs which were in effect the date the Notice of Intent for the project was issued (September 6, 1991).

OG-28

Comment noted. However, the analysis takes into account the existence of wilderness near Hollis. The analysis does not predict that the Polk Inlet Project would cause a significant restriction, but that given continued Forest Plan implementation a significant restriction would occur sometime prior to 2054.

OG-29

Comment noted. Field verification efforts are oriented toward unit and road feasibility. This includes input from many resource areas with the objective that unit and road prescriptions will be implementable during final layout and subsequent logging, while still meeting the various resource objectives.

OG-30

Comment noted. The allocation of land use designations, including those that permit or exclude timber harvest, is a Forest Plan-level decision and is beyond the scope of this EIS.

OG-31

Final harvest unit size is based on a number of factors including: economics, logging feasibility, future entry considerations, limitations established by the National Forest Management Act, standards and guidelines established by the Forest Plan, the visual quality objective and the existing visual condition of the viewshed, adjacency with past harvest, blowdown considerations, and other resource objectives. These factors were considered during the development of a Logging System and Transportation Plan for the entire area prior to field reconnaissance and during Interdisciplinary Team meetings to review unit data and develop prescriptions for each unit after field verification. Increasing unit size to improve economic returns will affect other resource issues and other units in the Logging System and Transportation Plan.

OG-32

Location of rock quarries will be based on economic criteria, as well as resource objectives in the area of operation.

## Comments of Owen Graham

Mr. David Rittenhouse  
November 24, 1993  
Page 6

## Responses to Owen Graham

OG-37	(4)	Units 612-216 and 217 should be combined. This is a low use area for all other resources and this will create a more economical unit.	OG-33	Comment noted.
OG-38	(5)	Drop Unit 612-230 - too much road for virtually no merchantable timber.	OG-34	Refer to response to RZ-44.
OG-39	(6)	Add Units 613-206, 208, and 234.	OG-35	Refer to response to RZ-45.
OG-40	(7)	Units 613-219 and 221 should have partial cuts allowed between the unit and the road to allow removal of the tallest overstory which may present a safety hazard.	OG-36	Refer to response to RZ-46.
OG-41	(8)	Enlarge unit 613-222 by adding a setting to the south.	OG-37	Refer to response to RZ-47.
OG-42	(9)	The estimate of volume/acre for 613-254 is too high.	OG-38	Refer to response to RZ-48.
OG-43	(10)	Drop Units 613-280 and 613-283.	OG-39	Refer to response to RZ-49.
OG-44	(11)	Add lower two thirds of Unit 674-211 for helicopter logging.	OG-40	Refer to response to RZ-50.
OG-45	(12)	Unit 674-265 should be enlarged to the north and south. This can be a partial cut with corridors - remove trees 20" and up, for example.	OG-41	Refer to response to RZ-51.
OG-46	(13)	Unit 674-283 must be enlarged to be economic. Add a setting along proposed road and enlarge the currently proposed setting.	OG-42	Refer to response to RZ-52.
OG-47	(14)	Unit 620-209: Southern half of unit contains large areas of 15-20 year old blowdown with second growth covering it. This portion may have to be dropped. Expand unit to the north. This unit is definitely not 52 MBF/ac.	OG-43	Refer to response to RZ-53.
OG-48	(15)	Unit 620-202: As much of Unit 620-360 as is possible should be added to 620-202 to create a large conventional harvest unit.	OG-44	Refer to response to RZ-54.
OG-49	(16)	Unit 620-231: Should try to shift unit to northeast along spec road and try to pick up more volume between road and creek to south where better wood is located.	OG-45	Refer to response to RZ-55.
OG-50	(17)	Unit 620-233: This unit should be dropped as it is very wet and has a lot of scrub muskeg.	OG-46	Refer to response to RZ-56.
OG-51	(18)	Unit 620-250: This unit has scrub timber, with unstable slopes and soils. It should be dropped.	OG-47	Refer to response to RZ-57.
OG-52	(19)	Unit 620-285: This has older second growth in old burn area. Trees are small to medium size but sound and well stocked. Instead of helicopter yarding unit could be roaded with only average difficulty. May be able to extend FDR 2150620 out above unit and log everything uphill.	OG-48	Refer to response to RZ-58.
			OG-49	Refer to response to RZ-59.
			OG-50	Refer to response to RZ-60.
			OG-51	Refer to response to RZ-61.
			OG-52	Refer to response to RZ-62.



Comments of Owen Graham

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Responses to Owen Graham

- OG-53 20) Unit 620-291: May be able to get full suspension across stream, eliminating a lot of road building. Extend unit to south along spec road to stream.
- OG-54 21) Unit 620-295: Volume similar to 285. Extend unit to north to stream boundary.
- OG-55 22) Units 620-307 and 620-325: Combine units and extend to north along FDR 2100.
- OG-56 23) Unit 620-343: This unit could be roaded from FDR 2150200-3 to reduce road building.
- OG-57 24) Unit 620-349: Pull northern boundary back away from stream to top of stream bank slope. Square off southern corner to gain deflection.
- OG-58 25) Unit 619-209: Extend boundary to south.
- OG-59 26) Unit 619-212: Drop this unit.
- OG-60 27) Unit 619-213: Extend boundary to south.
- OG-61 28) Unit 619-111: Drop - junk scrub muskeg.
- OG-62 29) Unit 619-270: Extend unit boundary to west and northwest to pick up blowdown timber.
- OG-63 30) Expand Units 622-203, 208; and 624-210.
- OG-64 31) Add units 624-244, 246; and 618-203, 205.
- OG-65 32) Delete units 624-210, 240; 621-268; and 622-267.
- OG-66 33) Shrink unit 618-209 to avoid the steepest slopes and cliffs.
- OG-67 34) Add a downsized version of 618-216 that deletes cliffs and other unsafe areas.

This concludes my comments on the Polk Inlet DEIS.

Sincerely,



Owen J. Graham  
Post Office Box 9023  
Ketchikan, Alaska 99901

- OG-53 Refer to response to RZ-63.
- OG-54 Refer to response to RZ-64.
- OG-55 Refer to response to RZ-65.
- OG-56 Refer to response to RZ-66.
- OG-57 Refer to response to RZ-67.
- OG-58 Refer to response to RZ-68.
- OG-59 Refer to response to RZ-69.
- OG-60 Refer to response to RZ-70.
- OG-61 Refer to response to RZ-71.
- OG-62 Refer to response to RZ-72.
- OG-63 Refer to response to RZ-73.
- OG-64 Refer to response to RZ-74.
- OG-65 Refer to response to RZ-75.
- OG-66 Refer to response to RZ-76.
- OG-67 Refer to response to RZ-77.

Full suspension of logs over streams requiring protection has been prescribed where applicable.

RG-1

Rowan Bay  
SITKA, AK  
99835

BMB's on Kuiu island to a large extent seem to ignore the benefit of cable logging over protected creeks using ridges and tail-trees for deflection. Tail trees have to be of adequate size and height and sound so they can be safely used by the men working around them.

Creeks seldom run straight up and down a hill, more damage can be done diagonally, splitting a creek then logging your rigging back further, ridges, tail-trees, etc, and carrying the logs over it.

Ralph C. Groslong

RG-1

## Comments of Morgan Kelly

### Polk Inlet Subsistence Comments

Hollis, AK 9950  
02 NOV 93

MK-1

Today I attended a meeting at the Hollis Public Library. It was quite informative. Most of the information presented was against logging for various reasons. The most ~~addressed~~ <sup>mentioned</sup> reason were because of some noted discrepancies in the FIS & some were because of reduced deer hunting or at least a perception of this.

Unfortunately, the meeting was advertised for 2 o'clock and this is unfortunate because the open house was at 2 o'clock but the formal meeting did not start until 4 o'clock, so many who would have a different view had left before the meeting opened. By the time the meeting was concluded at 6 o'clock only 4 Hollis families were represented. Although the vocal comments were against logging, there are at least 10 Hollis families that make their primary income directly from the logging industry.

of

MK-2

Mrs. Reives were the major vocal input against logging & their primary concern is man's impact on the bio-eco system, therefore they are against logging. At the same time they are using timber to build a new house. Man can not live without utilizing air, food, clothing & shelter, and at the same time giving off waste. This is unavoidable. It does not reason that they can utilize timber from Prince of Wales for their dwelling and at the same time deny someone else the same. He also mentioned that the timber resources on POW were finite resources, but this is a bit misleading. In actuality the timber resources are renewable resources. I come from an agricultural community & tilling fields & cutting hay meadows affects nature & natural resources directly but this is unavoidable as man requires food to live. I do favor the use of buffer zones on streams while still providing adequate timber for logging.

MK-3

Please remember to provide your name and address on the reverse side.

Thank you,  
Morgan Kelly

## Responses to Morgan Kelly

MK-1

Comment noted. Please note that the meeting was advertised as an open house and subsistence hearing and the advertised time for the Hollis meeting was 2-3pm for the open house and 4-6 pm for the subsistence hearing (see October 4, 1993 edition of the Island News). Both times were given.

MK-2

Comment noted.

MK-3

Comment noted.



PO. Box 527  
Craig, AK 99921

RK-1

Refer to response to ADFG-39.

October 30, 1993

Mr. Dave Arrasmith  
USDA Forest Service  
Federal Building  
Ketchikan, AK 99901

RE: Polk Inlet EIS

Dear Dave,

Having browsed through the EIS publication sent to me by your office, I encountered a few questions that I would like to call to your attention. More specifically, I would like to direct your attention toward the cave resources in that area.

RK-1

It is my understanding that karst features have been identified in VCU's 624 and 675 of the Polk Inlet EIS. It is my opinion that the aforementioned areas should be removed from the listing until such time as the karst has been more fully investigated and cataloged. Having spoken to several Forest Service employees, that participated in the administration of those sale areas, it is obvious that there are abundant karst features.

If the Forest Service needs any assistance in locating and identifying potentially significant karst resources, I would be more than willing to participate in such an operation. As a participant in the Tongass Cave Project, during the month of July this year, I have located and mapped many caves on the island.

Thank you for taking the time to look into these questions of mine, and I am looking forward to hearing from your office very soon. Keep in mind my offer of assistance, and feel free to contact me at any time if my help is needed in those areas mentioned.

Sincerely,



Robert R Knotts

## Comments of Libby Kvaalen

P.O. Box 527  
Craig, AK 99921  
November 24, 1993

Forest Supervisor, Ketchikan Area  
Tongass National Forest  
Attn: Polk Inlet EIS  
Federal Building  
Ketchikan, AK 99901

Dear Sir,

I am writing to comment on the Draft Environmental Impact Statement (DEIS) for the Polk Inlet Project Area. In the summary section of the DEIS it is stated that written comments must be received by November 24, 1993; however, in a supplemental pamphlet mailed out by Ebasco Environmental it is stated that written comments must be postmarked no later than November 24, 1993. There is obviously a discrepancy, but I would assume that you would go with the latter one as it provides the greatest comment time and it was not the public's fault that two different statements were made about the due date for comments. With that, I assume that you will accept my comments. Please let me know if otherwise.

I scanned through the DEIS (no I didn't read every word), paying particular attention to the wildlife sections and related sections as wildlife biology is my area of expertise. I would like you to consider the following comments and questions when preparing the Final EIS:

### Comments and Questions (by chapter)

#### CHAPTER 2

##### p34-38, Mitigation Measures

**LK-1** Why are muskeg buffers not included as a mitigation measure? Muskeg buffers were a wildlife mitigation measure in the 1989-94 Long Term Sale EIS. In that document it is stated that they are a transition zone which contains important wildlife habitats for Vancouver Canada goose nesting and brood rearing, diversity and travel corridors. The 1989-94 EIS devotes a page to the importance of muskeg buffers and cites literature to support the importance. Muskeg buffers are not mentioned at all in the Polk Inlet DEIS. Was there a reason for this, or was it overlooked? If there was a reason, please state it in the Final. Otherwise, please reconsider.

**LK-2** Mitigation measures are noted as applying to certain units. I think the EIS needs to provide latitude to apply some or all of the measures to any unit where they are found/felt to apply during implementation as field crews may find that mitigation should apply to more, or fewer, units than are currently identified.

**LK-3** Goshawk surveys are recommended for the Old Franks area only. Surveying in that area is a good idea, but is based on the fact the Ebasco personnel observed goshawks in that area during the summer of 1992. Goshawks have been observed in other areas of the Polk Inlet Project Area as well by Forest Service personnel. Also, there are other areas of suitable habitat. Perhaps these areas should be surveyed as well. At least this issue should be addressed more thoroughly in the EIS. To recommend further goshawk surveys in only one area based on two single, chance observations seems a bit cursory.

## Responses to Libby Kvaalen

LK-1

Muskeg buffers are not required under the TLMP or the TLMP Draft Revision standards and guidelines. These Forest Plans do not remove them from the timber base and include them in ASQ calculations. Therefore, they are not automatically established during timber sale planning. However, muskeg protection and avoidance of impacts to Vancouver Canada geese are addressed by a number of Polk Inlet Project mitigation measures including: F4, which requires unit design modifications (including buffers) to avoid or minimize damage to muskegs; W1, W2, W3, W4, and W5, which effectively create buffers or partial-cut buffers along some muskegs; and W10 and W11, which avoid or minimize human disturbance impacts to wildlife that use muskegs.

LK-2

The application of mitigation measures to units was not an office exercise. Field reconnaissance was conducted for all potential harvest units and decisions regarding which measures to apply were based on this field reconnaissance. Some changes to the list of measures associated with each unit are expected as a result of unit layout.

LK-3

Goshawk surveys have been conducted within the Polk Inlet Project Area during the summers of 1993 and 1994 and these results have been incorporated into the FEIS. Additional surveys have been recommended at the 21 potential harvest units near the area where goshawk presence is suspected as a result of Polk Inlet Project field reconnaissance. This requirement represents a minimum level for additional survey.

## Comments of Libby Kvaalen

Measures W1 through W5 address snag retention and types of clearcuts to provide structural diversity. Great ideas, but I have a few comments. Of course it is good to leave snags. Does leaving snags and unmerchantable trees scattered throughout the unit really provide significant structural diversity? I hope it does, but some documentation or at least speculation on this would be nice. Leaving scattered trees plus islands is even better, but if these islands are placed in cliffy areas or are low volume timber how great is their importance? Are these patches of trees large enough to provide the microclimate necessary to preserve forb and shrub species into the future when canopy closure occurs in the second growth stand? I am supportive of these mitigation measures, but wonder if they could be addressed in more depth. Also, leaving unmerchantable timber along unit boundaries and water quality streams was recommended in the 1989-94 EIS and was not often achieved. Is there some assurance that logging operations will be able to achieve recommendations for leaving snags and unmerchantable trees within the cutting unit boundaries? I suggest that the EIS recommend a tracking system (possibly GIS) for snags patches/leave islands so that they are located on a good map for easy reference.

### CHAPTER 3

#### p86, Old Growth Forest

The DEIS states that currently most (85-90%) of the pre-logging old growth still exists on the Tongass. I think a statement should also be made about the percent of pre-logging old growth (both productive and unproductive) that still exists on Prince of Wales Island and in the Project Area. I believe such statements would be more relevant to the EIS than figures concerning the Tongass as a whole because the Tongass is divided into islands. What is happening in other areas of the Forest has little impact upon the flora and fauna of POW.

LK-6

The DEIS mentions that Paul Alaback's work suggests that old growth structural attributes are usually not present in a stand younger than 150 years old. I agree with that, but the statement insinuates that such characteristics would be present in a stand older than 150 years. I don't believe that is necessarily true, and if there is documentation of that being true I think it should be presented in the EIS more clearly.

#### p102, TES Species

The DEIS includes information and analysis of USFWS candidate Category 2 species--the marbled murrelet, the northern goshawk and the western spotted frog. It did not address two Category 2 species that I believe likely occur in the project area--the harlequin duck and the olive-sided flycatcher. At least the latter may have been listed as a Category 2 species after the DEIS was written, but both should be addressed in the final.

The DEIS addresses only one sensitive species--the trumpeter swan. I believe the osprey should also be included as there has been one sighting of an osprey in the project area. Even if there were no sightings, the area does contain osprey habitat and the species could potentially occur there.

#### p106, Swans

The DEIS mentions trumpeter swan wintering locations nearest the project area and cites 4 areas where swans were seen on March 11, 1991. Swans have been observed in many more areas in and near the project area both by casual sightings and flight surveys for wintering swans. Areas include Trocadero Bay, unnamed ponds just east on the Polk/Hydaburg Road intersection, Old Franks Lake, Smith Lagoon, Pass Lake, and an unnamed lake southeast of Kina Cove. All of these areas are within the Project Area.

LK-8

## Responses to Libby Kvaalen

LK-4

A more detailed discussion of the wildlife mitigation measures is presented under Mitigation in the Wildlife section of Chapter 4. Measures W1 through W5 are specifically addressed under Stand Level Mitigation. Please note that the Monitoring Plan in Chapter 2 includes a Project-specific monitoring measure (Ecosystem Management) designed to determine if Measures W1 through W5 have been implemented and are effective.

LK-5

The acreage of pre-logging old growth (both productive and nonproductive) in the Project Area is addressed in the Vegetation and Timber Resources sections of Chapters 3 and 4 (e.g., in Table 3-22 the Total CFL and Non-CFL represent total pre-logging productive and nonproductive old growth, respectively). The Vegetation and Timber Resources section of Chapter 4 has a section on the Cumulative Harvest on Prince of Wales Island and includes the acres of suitable-available old growth.

LK-6

The insinuation that old-growth characteristics begin to develop in stands older than 150 years old is based on Alaback's work and the Forest Service Report R10-TP-28, "Ecological definitions for old-growth forest types in the Alaska region" by Capp, Zee, Alaback, Boughton, Copenhagen, and Martin.

LK-7

The FEIS and the Biological Assessment/Biological Evaluation specifically address the referenced species.

LK-8

The reference to wintering swan locations has been broadened to include the additional areas.



## Comments of Libby Kvaalen

p119, HCAs

The Forest Service Viable Population Committee's work is mentioned and Habitat Conservation Areas (HCAs) are addressed. A map of the HCAs should be included for easier visualization of the areas. The section does not say how the EIS does or does not incorporate the HCAs and leaves the subject somewhat suspended. Please address this more fully and clearly in the final.

LK-9

p128, Roads

This section refers to the 1989-94 EIS Access Management Plan. It does not reflect that the plan has not been followed and the problems associated with implementing that plan. For example, the roads to Indian Creek, Polk Creek, and some in the Goose Bay area were scheduled to be closed and have not been. How will it be ensured that the Polk Inlet EIS Access Management Plan is better implemented? This is a very important issue from a wildlife, recreation, fisheries and road maintenance point of view.

LK-10

Subsistence

The DEIS talks of conditions existing where nonsubsistence harvest may need to be restricted (as early as 1994 for black bear and marten, p170 and 171). While subsistence rights may be protected, hunting and fishing by nonsubsistence residents and nonresidents as well as nonconsumptive wildlife uses (viewing, photographing, etc) are important also, both to the users themselves and to the economic welfare of POW from tourism and the island's growth. People come to POW both to visit and to live partly because of the opportunities to hunt, fish and see wildlife (the image of Alaska). If these opportunities are curtailed because season's and bag limits have to be reduced or eliminated, and because fewer animals out there means fewer viewing opportunities, it will have an impact on the island residents due to a loss of tourism and possibly subdued growth as people find out that the image of abundant fish and wildlife is not supported on POW. Also, restricting nonsubsistence use of resources will affect many people from Ketchikan who come to the island to hunt and fish. While these people are not technically/legally considered subsistence users, most people would recognize that the division of communities into subsistence and nonsubsistence was a somewhat arbitrary decision based on population. Many rural residents (subsistence) do not actually subsist on fish and game and likewise many nonrural (nonsubsistence) residents do rely on those resources and/or have traditionally used them. I strongly support protecting the rights of subsistence users, but I think the importance of the resources for consumptive and nonconsumptive uses to all Alaskans as well as tourists is overlooked and should be addressed more seriously. Just because subsistence users are protected does not mean everything is okay.

LK-11

CHAPTER 4

p65, Thinning

Table 4-34 recommends a thinning schedule for second growth stands. It recommends thinning stands to between 450 and 800 trees per acre depending upon the Site Index. 450 trees/acre is equal to a spacing of about 10 feet by 10 feet. This is the widest spacing recommended. A 10' by 10' spacing is not very wide. For wildlife values and increased biodiversity, wider spacings are recommended by researchers of the subject. This section on thinning needs to be addressed in more depth. The EIS should not lock managers in to thinning to a given spacing, but rather should allow latitude to conduct different treatments depending upon the desired future conditions of stands. Wider spacings and variable spaced thinning need to be considered for increasing wildlife habitat values and biodiversity. Second growth management on POW is a major issue to land managers and should be given more attention in this EIS, or at least no "mandates" should be made in the EIS.

LK-12

## Responses to Libby Kvaalen

The FEIS has been modified to incorporate two revised old-growth retention strategies that include the maintenance of large old-growth blocks. Alternatives 2 and 5 were revised to be consistent with these two strategies.

LK-9

The access management plan in the FEIS is expected to be implemented if accepted in the ROD.

LK-10

Comment noted.

LK-11

No mandates are given in the EIS for thinning other than to conduct variable spaced thinning on an experimental basis (Mitigation Measure W6). Thinning stocking levels listed in Table 4-34 are target levels based on stand models for the purpose of optimizing timber production only. Variable and wider spacings are discussed and proposed under Stand Level Mitigation in the Wildlife Mitigation section of Chapter 4.

LK-12

## Comments of Libby Kvaalen

p73,74, Effects on Old Growth

**LK-13** The DEIS states that 6-7% of old growth existing after completion of the 1989-94 EIS timber harvest will be harvested under the various alternatives of the Polk Inlet DEIS. What percent of pre-logging or pre-1954 old growth will have been cumulatively harvested from the project area following implementation of the DEIS alternatives? Six to seven percent does not sound like much, but it is misleading because it does not reflect cumulative effects. There is not much old growth left in the project area, and harvesting any percentage of it is going to have serious impacts to wildlife.

p89, Cumulative Effects

**LK-14** Table 4-54 displays cumulative effects on management indicator species out to the year 2054 (about 60 years from now). It indicates drastic reductions by 2054 in the habitat capability for all species from pre-logging 1954, and drastic reductions for almost all species from the present habitat capability. For example by 2054, marten capability will decrease 55% from 1954 and 34% from the present; bear decrease 42% from 1954, 33% from present; Vancouver Canada Geese decrease 78% from 1954 and 65% from present; deer decrease 54% from 1954 and 34% from present. Similar figures have been presented in other Forest Service planning documents. Are these reductions really acceptable?! It seems ridiculous and outrageous that such reductions in habitat capability for so many species (management indicator species, no less) would be acceptable for the Polk Inlet project or for any of the other projects for which similar figures are projected. I understand that the Forest Service is mandated to maintain well distributed, viable populations and I don't know exactly what populations are required to meet that mandate (I know people are working on the question, but I'm not convinced anyone knows for sure). I would think that rather than working to meet minimums (maintaining just enough habitat and/or individuals) it would be more prudent to work to maintain healthy and abundant populations for many, many reasons including simple respect for the species, avoidance of premature extinctions, biodiversity, subsistence and tourism to name a few. Cumulative effects is one of the biggest (if not the biggest) and most serious issues facing the natural resources of Prince of Wales Island. Rather than putting off facing the issue until 50 or 100 years from now, the Forest Service needs to start now to address that issue by reducing those impacts through reduction of the magnitude of current projects. The issue of cumulative effects for all resource and particularly wildlife, needs to be addressed in more depth in the Final. Questions about the acceptability of drastic habitat capability reductions need to be addressed.

**LK-15**

The DEIS does say that the Tongass Land Management Plan Draft Revision (1991a) provides a maximum potential effects analysis for MIS by ecological province and is incorporated into the Polk Inlet DEIS by reference. I think this is something of a copout and an avoidance of dealing with this extremely important issue head on. The Polk Inlet EIS should completely address cumulative effects for North Central POW ecological province and South POW ecological province including Forest Service, state and private lands. If it is felt this is thoroughly addressed in the TLMPPR, then at least the analysis from that document should be reprinted in the Polk Inlet EIS.

**LK-16**

Again, I strongly emphasize that cumulative effects is one of the most important consequences of land management on POW (and the entire Tongass). The POW ecosystem is not a fire ecosystem, so timber harvest cannot be used to mimic that natural process as it is sometimes "down south". The effects of timber harvest in this ecosystem are completely unnatural and cumulative

## Responses to Libby Kvaalen

LK-13

The implication that there is an attempt to hide the total harvest from pre-1954 through Polk Inlet is untrue. One needs only to look at any of the habitat capability tables for the MIS or the deer winter range table; all show the 1954 pre-logging figures along with the figures for each alternative. In addition, cumulative timber harvest from 1954 through the present and beyond is appropriately presented in the Cumulative Effects section under Vegetation and Timber Resources in Chapter 4.

LK-14

Comment noted. Cumulative effects analyses have been refined in the FEIS.

LK-15

The complete analysis of cumulative effects for the entire North Central POW and South POW ecological provinces is a Forest Plan-level analysis. Incorporating this information by reference is not a copout. Reprinting a readily available analysis like this would be an unnecessary waste of paper.

LK-16

Comment noted.

Comments of Libby Kvaalen

Responses to Libby Kvaalen

LK-16 (cont.)	effects are very seriously disruptive to the natural ecosystem. It would take hundreds of years for any harvested stand to once again exhibit characteristics that are natural to southeast Alaska. Timber harvest could be sustained on POW on a small scale to provide some jobs and wood products to the community, but the large-scale timber harvest that has been occurring and is being planned is not sustainable and is cumulatively a disaster for the ecosystem. None of these practices fit in with the Forest Service's concept of ecosystem management-- not from an ecological, economical or sociological perspective.	
	p94, 95 Stand Level Mitigation	
LK-17	Mitigation measures referred to in this section (ie W9) don't correspond with the mitigation measures in chapter 2 (Table 2-3) . An editing error.	LK-17 Several of the mitigation measure numbers in this section needed correcting and have been revised in the FEIS.
	p95, Road Closure	
LK-18	Many roads in the DEIS are given the closure class of "discouraged" which means natural barriers such as alder growth and blowdown will be relied upon to close the road. If a road is going to be allowed to close by not maintaining it, why not just close it as soon as possible after harvest with rocks, trenches, etc. If a road is open for awhile, the public will get used to using the road and before natural closures occur hunting and other disturbance to wildlife could already have had a major impact (it will take a number of years for alder growth to inhibit traffic, blowdown can't be counted on--timing and location is unknown) . Closing with equipment may be more costly, but it could be part of the operator's responsibility. The cost of these sales is so high that the cost to move some rocks or dig some trenches etc would be negligible.	LK-18 Your comments have been considered along with others on this subject and the proposed access management been refined.
	I feel more roads should be actively closed. POW as a whole and the project area specifically are already heavily loaded. People can walk or ride their bike on closed roads. Actively closing roads would greatly help reduce disturbance to wildlife.	
	p156, Subistence Cumulative Effects	
LK-19	Cumulative subistence analysis in the DEIS projects animal habitat capabilities into the future but assumes harvest levels (both rural and nonrural) will remain at current levels. I think this is a poor assumption. Harvest rates for most species have been increasing (dramatically for some species such as bear) and there is no indication that this trend should not continue at least to some degree. The human population on POW is predicted to grow as is the amount of tourism (including hunters and fishers) to the area. I think it is ridiculous not to project harvest rates/hunter demand. At least the reasons for not doing so should be completely addressed. Also, the analysis only addresses cumulative effects for the project area. Cumulative effects analyses should encompass the entire area upon which these effects might be felt. In this case the entire island should be included in the analysis as hunters (subsistence and nonsubsistence) that currently hunt in areas on north POW may well begin to seek out areas in central and south POW to hunt as game populations decrease on the north end of the island due to extremely heavy logging and resultant second growth stands.	LK-19 The assessment of cumulative effects on subsistence has been revised in the FEIS. Growth in demand has also been incorporated.
	p172, 173, Conclusion on Subsistence	
LK-20	The DEIS summarizes to say that the action alternatives would not significantly effect subsistence use of food resources except for bear and marten for which there is a significant possibility of a significant restriction on subsistence (crazy wording!). I attended one subsistence hearing. At that time I had not had time to read the DEIS and I did not stay long at the hearing, but there was nothing in the hearing room to openly "advertise" these possible significant effects to subsistence use of	LK-20 Comment noted. ANILCA 810 Subsistence Hearings are intended to be a place where subsistence comments regarding the action being evaluated can be provided to the land management agency. The Forest Service typically does not make formal presentations at these hearings, but rather listens to testimony. It is expected that most people attending would have reviewed the DEIS or at least the summary and conclusions regarding subsistence. Subsequent comments, can be provided as you have done, in written form.



## Comments of Libby Kvaalen

LK-20  
(cont.)

some species. People from the public should not have to go to such a hearing armed with memorization of documents and prior full understanding of the issues. All possible effects (negative or positive) on subsistence should have been openly displayed and aggressively presented to people. Rather, little or nothing was said about the issues unless someone knew what specific questions to ask. These hearings should be better managed by the document authors to put issues openly on the table for all to see and understand.

LK-21

The DEIS then goes on to say that Section 810 of ANILCA requires that when a significant restriction may occur, determinations must be made in regard to whether the restriction is necessary....minimum amount of public land will be involved....and reasonable steps will be taken to minimize the impacts to subsistence. These three issues are then discussed. The last paragraph of the section "Necessary, Consistent with Sound Management of Public Lands" states "Therefore, based on the analysis of the proposed alternatives presented in this document, these actions are necessary, consistent with the sound management of public lands." The brief discussion that precedes this statement is very confusing and does not readily lend support to the statement. Please clarify in the Final.

LK-22

The document goes on to say that care will be taken to maintain the highest subsistence use areas such as beach fringe. Beach fringe gets high USE, but more habitat than just the beach fringe is needed to sustain animal populations. The document insinuates that because these high USE areas are protected there will be adequate numbers of animals for harvest.

LK-23

I understand that the Tongass National Forest has a long term contract with the Ketchikan Pulp Company to supply it with timber for its mill. However, it would not be IMPOSSIBLE for the Forest Service to break that contract and pay damages to KPC if Forest Service officials feel strongly that continued, heavy timber harvest is not in the best interest of the natural resources (biotic and abiotic) of the Forest. I think this option should be seriously considered in light of the projected cumulative impacts that are occurring on POW. National Forests are for MULTIPLE USE. In this ecosystem, other uses such as recreation, tourism, fish habitat and wildlife habitat may ultimately be more important than large-scale timber harvest--ecologically, economically and sociologically.

I know that my comments and questions have tended to dwell on the "negative", but those are the things that I am concerned with. I appreciate the hard work that goes into preparing an EIS, and I also recognize the review and comment period as an opportunity for authors of the document to reassess their work based on comments and questions from other sources and interests. Please consider my input as constructive and not destructive as I value the resources of southeast Alaska and hope that they are maintained and sustained.

*Libby Kvaalen*

Libby Kvaalen

## Responses to Libby Kvaalen

LK-21

Refinements have been made to this section in the FEIS for clarity.

LK-22

Refer to response to ADFG-50.

LK-23

Only Congress can break the contract with KPC. This option is considered beyond the scope of this project-level EIS.

## Comments of Marcel LaPerriere

Forest Supervisor  
Ketchikan Area  
Tongass National Forest  
ATTN: Polk Inlet EIS  
Federal Building  
Ketchikan, AK. 99901

October 8, 1993

To Whom It Concerns,

After looking over the draft EIS for Polk Inlet I see there is very little mentioned about caves and karsted areas. Whereas I realize there isn't a whole lot of karst in the area I would hope the final EIS will address long term management of karst and karst related features.

In my wife's and my travels of Southeast Alaska we have seen very little planning when it comes to caves. We realize much of the negative impact that we have noted accrued prior to the Federal Cave Resources Protection Act of 1988. However we have also seen a lack of mitigation on karsted areas that have been logged after 1988.

Due to the high significance of Southeast caves and due to the fact that regeneration appears to be slower on karsted areas even very small deposits of marble, limestone and dolomite need to be looked at very carefully. My wife and I recently visited a clear cut area up Carroll Inlet near Marble Creek that was logged in 1974. During that visit we noticed there has been very little regeneration in the marble deposit areas, most especially in the higher altitudes. I would hope a visit to Polk Inlet 20 years from now we won't see a lack of regeneration on what your Draft EIS calls limited Karst topography. I would also hope we will not see total disregard for the cave entrances as we have seen on north and central Prince Of Wales and up Carroll Inlet. (Yes there are caves up Carroll Inlet)

The information contained within the "Summary Comparison of Environmental Consequences" shows only 2 caves will be impacted if alternative 2 or 3 is chosen and only one if 2 or 5 is chosen. What isn't addressed is how will any caves that might be discovered during logging be managed. I hope the final EIS will address this issue.

Living in Ketchikan I understand the importance of continued timber harvesting on the economy. I would just ask all concerned to learn from past mistakes, so future generations can enjoy our National Forest, and the timber industry can enjoy a sustained yield.

Thank you.

Sincerely,



Marcel LaPerriere  
P.O. Box 9062  
Ketchikan, AK 99901  
Home (907) 225-4094

## Responses to Marcel LaPerriere

ML-1	Refer to response to ADFG-39.
ML-2	Refer to response to ADFG-39.
ML-3	Refer to response to ADFG-39.

## Comments of Richard Myren

Forest Supervisor  
Ketchikan Area  
Tongass National Forest  
Federal Building  
Ketchikan, AK 99901

Comments on the draft EIS for Polk Inlet.

RM-1

p. 3-32; 3-33; 3-45; 4-31.

The Forest Service has no credible observations on suspended sediment for southeast Alaska forest drainages. The criticism's (Encl. #1 and Encl. #2 respectively) show the only published reports of suspended sediment for Tongass streams (Meehan, Farr, Bishop and Patric (1969) and Paustain (1987)) to be so deficient and exhibit such an incompetent analysis that they would be laughable if not for the great effect of these two publications on the past management and upon the present proposed management of the Tongass.

An unpublished report by Dan Bishop<sup>1</sup> which included an analysis of Indian Creek at Hollis suspended sediment could have formed part of the basis of a future analysis comparing, for example the suspended sediment in the logged watersheds of the Hollis area to present suspended sediment and past records. However, now with a road system of Indian Creek and cutting in the period which was requested to be suspended by AIFRB (Encl. # 3) the only comparative historical base has been lost. There has been therefore no substantive effort to determine suspended sediment, and its effects, nor does the future look wall that it can be accomplished on the once best possible site employing Indian Creek as a baseline.

<sup>1</sup> Office report on suspended sediment work at Hollis Ak. with 1961 supplement. Ak. For. Res. Center, Juneau, AK., May 8, 1961. FS-1-w2.1. 22p.

## Responses to Richard Myren

RM-1

As stated, the two papers referenced in the EIS (Meehan et al. 1969; Paustain 1987) present the only published data on suspended sediment relationships and logging on the Tongass National Forest. The methods and level of analysis used in these studies are documented in them. Additionally, comment noted.



## Comments of Richard Myren

**RM-2** Peila and Myren (1973) concluded that sediment (within gravel), and superimposition were confounded with survival rates, not that survival rates did not decrease during logging. The statement (para.3 p. 3-33) is incorrect. The actual data of the six sampling stations reveals a picture of decreased survival during logging and not a return to prelogging conditions (Encl. #4).

**RM-3** Evapotranspiration effects over the long term growth of second growth forests upon streamflow has not been recognized in the POLKDEIS nor the appropriate corrective actions in best management practices established. Harr (1983) and Hicks et al., (1991) publications, not cited in the POLKDEIS, verify the previous sentence statement (Encl. #5).

**RM-4** p. 3-37; 4-31&32; 4-44  
The temperature and dissolved oxygen sensitive streams, such as Trocadero Creek, are not recognized and the occurrence of "fish kills" there (Encl. #6). The extensive 1993 "fish kill" was not the first recorded. The conifer reproduction on Trocadero Creek has been interpreted by alder succession in riparian areas and may be contributing to reduced streamflow, higher temperatures, and lower dissolved oxygen, similar to the 1993 occurrence on Stanley Creek (Encl. #5).

The problem with reducing long term temperature effects (4-31, 4-32) is that stream flow in the BMP model is not a function of the processes that control the flow, i.e., amount of area cut, kind of vegetation, and evapotranspiration (Encl. #5). The POLKDEIS (p.4-29) dwells on short term effects and Bartos statements and others have little relevance to cutting effects that last a long time.

**RM-5** p. 3-37 to 3-41. 4-35.  
Habitat capability models are absurd both because of the unpredictability of a long term projection and because low streamflows as a function of evapotranspiration rates, and the amount of area converted to second growth forests, are not in the model. The BMP model does not include such a function also. For a way of determining how low streamflow may be predicted see enclosure #5.

**RM-6** p. 3-37 and 3-38; 2nd para.p.39.  
The knowledge of effects of logging at Hollis is virtually non-

## Responses to Richard Myren

**RM-2** The discussion referenced on paragraph 3, page 3-33 of the DEIS states that "Pella and Myren (1974) conclude that studies conducted on streams near Hollis ... failed to reveal a meaningful relationship between clearcut logging to streambank and subsequent pink salmon escapements." The discussion says nothing specific about survival rates. Your attachment referencing decreased survival during logging between 1958 and 1964 is noted.

**RM-3** Discussions of streamflows and evapotranspiration in second growth forests have been added to the Chapter 4 section on Water Resources Hydrology in the Water, Fish and Fisheries section.

**RM-4** Temperature sensitivity is discussed in the EIS in the section on Temperature and Dissolved Oxygen of the Water, Fish, and Fisheries section of chapter 4. The fish kills referred to in the attachment occurred three months after the DEIS was published. The possibility that alder dominance of floodplains in areas harvested under previous Best Management Practices may be affecting streamflows has been added to those sections.

**RM-5** Refer to responses to RM-3 and RM-4. Additionally, comment noted.

**RM-6** Refer to response to RM-2. Additionally, your disagreement with the 1968 and 1969 publications is noted.

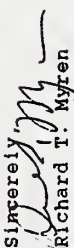
## Comments of Richard Myren

RM-6 (cont.) existent because of the serious errors in the published records and their interpretation (Encl. #4). R-ratios (Encl. #8) suggest significant adverse effects of logging on Maybeso Creek, and the ratios lean toward adverse effects for Harris River. The Saio (1967) publication documented a decline in survival rates during logging, and Peila and Myren (1974) documented it for one sampling station on Harris River. The cause was confounded among factors, one of the factors being logging. A detailed analysis suggests logging was important in the decline. The other five sampling stations do not show the return to prelogging levels (Encl. #4).

RM-7 In all the 3-37 3-41 discussion LWD is the major factor, while minimum streamflows are ignored. Both are quantitatively important.

RM-8 Indian Creek. Baseline for logged drainage Alternative 2 is wrong (p. 4-121), no further road should be constructed. No logging should be permitted on the drainage. AIFRB recommended protection of the watershed from logging and roading. (Encl. #3). The history and significance of the watershed is reviewed (Encl. #8)

RM-9 I conclude from the previous review the Forest Service doesn't care about the fishery resource, and never did.

Sincerely,  
  
 Richard T. Myren  
 3320 Fritz Cove Road  
 Juneau, Alaska 99801

November 23, 1993

file\_\_polki

## Responses to Richard Myren

Refer to responses to RM-3 and RM-4.

RM-7 Land allocation is a Forest Plan decision and is beyond the scope of a project level EIS. Indian Creek was recognized as an issue within alternative development. Alternative 5 does not enter the Indian Creek drainage.

RM-8 Refer to responses to ADFG-33, 34, 36, and 37. Additionally, in several places the EIS discusses the level of field effort performed to locate and prescribe protection for class I, II, and III streams. Table B-2 in Appendix B documents mitigation measures for all units. Mitigation Measures F1 through F9 (Table 2-3) summarize fish, water quality, and soils mitigation measures. In addition, final layout of units will provide another level of review and prescription of site-specific soil, stream, water quality, and fisheries protection. The Ketchikan Area Monitoring Plan (refer to response to SEAC-30) also provides for implementation and effectiveness monitoring of fisheries and water quality related Best Management Practices. The potential effects of timber harvest on fisheries resources and water quality are discussed in Chapter 4. Additionally, comment noted.

Forest Supervisor

Ketchikan Area

Tongass National Forest

November 21, 1993

Re - Response to Polk Inlet Project Draft EIS

CR-1

Comment noted.

CR-1

In the time span of a few decades, a geological blink of an eye, the whole of Prince of Wales and its smaller satellite islands have been undergoing rapid transformation as its climax communities are subjugated to man made disturbances on an historically unprecedented scale.

Present policies and management practices on the Tongass, employed by the Forest Service, respond to political and economic pressures favorably by allowing timber to be removed before sufficient ecological data can be gathered, interpreted, let alone applied. Neither the Polk Inlet Project DEIS, or its predecessors, are in compliance with the guidelines set forth for this purpose by NEMA, NEPA, or ANILCA 810. Yet these practices (logging, roading) continue unabated.

Across Polk natural landscapes are being transformed to the point where they are no longer self sustaining, creating a biological wasteland. It is a known fact that each species is the product of a long evolutionary history adapted to the physical and biological components of its particular environment, an environment which is physically finite. What is unknown are the unexpected and far reaching effects the process of tampering with these components can produce, given their roles have not been clearly defined or understood by those responsible for their continued health.



Comments of Cindy Rieves

CR-1 12  
(cont.)

Ecosystems around the globe have been heavily influenced by human presence and pressure to exploit and extract the biosphere's resources in order to satisfy a single species demand. Where some ecosystems are more resilient than others to human activities, others require both great time and effort for repair once they've been degraded, while some, never do recover.

Whether Prince of Wales is given the opportunity to recover from decades of envisioned mismanagement and ecosystems abuse remains to be seen. If current trends are allowed to continue, as projected, than what took a millennia to create will be gone within the next few years. It's not too late to stop, if we stop these activities now.

Sincerely,

Cindy Rieves  
(Hollis, AK.)

\* Choose ☒ IA (no action - no harvest) Alternative

the only possible alternative

Forest Supervisor, Ketulikan Area  
Tongass National Forest

Nov. 16, 1993  
P.O. Box 298  
Klawock, AK.  
99925-

Re Response to Polk Inlet Draft Environmental Impact  
Statement (DEIS)

Subsistence // Wildlife

As with the TUMP Rev DEIS '91 (SDEIS), the DEIS fails to provide land use designations around Hollis which would allow an 'enduring' habitat base sufficient in size and appropriate proximity. [Ref. Rieves' response to SDEIS, and copy to Rittenhouse for scoring input]. It must be emphasized again that WAA 1317 is the most critical use area for Hollis residents. That the Forest Service (FS) explicitly ignores this is manifest in the SDEIS, Alternative - P (Alt. P). The percentage area type distribution for WAA 1317 is given as 28% = natural setting, 56% = moderate development, and 16% = Intensive Development.

Selected Problems in DEIS

- Table 3-30: WAA 1317 has 265% loss in high quality deer winter range for '54 → '94, and a corresponding 49% increase in low quality
- Table 3-59: FS cannot assume that deer were harvested exactly according to % of WAA 1317. Cap. in Project Area. Respondents, at best, only reported WAA of harvest.
- Figure 3-25: Deer harvest effort under-represented in Northern portion of VCU 611
- Tables 3-63 & 3-64: Pink salmon subsistence use in Maybeso CK. low by at least a factor of 100; permits low by at least a factor of 3  
Problem = ADPFG permits do not ask for community of residence
- Table 3-43: Patch size effectiveness not broken into WAA's
- Table 3-65 and all data in Ch. 4: EOP. w.r.t. deer habitat capability, no patch size adjustments made. Example, Table 4-54: all cumulative effects for subsistence, with a fraction of patch size are significantly under-estimated.

MR-1

The identification of land use designations is done at the Forest Plan level. Project-level analyses, such as the Polk Inlet Project, are intended to implement the Forest Plan, which is currently undergoing revision. However, none of the Polk Inlet action alternatives propose harvest within about 3 miles of Hollis, in the Maybeso Experimental Forest, or along the Hollis-Klawock highway.

MR-2

Comment noted. The total change in winter range between 1954 and 1994 is correctly accounted for in the subject table based on the sum of low, mid, and high quality winter range for each year.

MR-3

The analysis referred to has been changed to reflect total harvest throughout the WAA, including portions outside the Project Area.

MR-4

This figure and related figures are based on results from the Tongass Resource Use Cooperative Survey (TRUCS 1988).

MR-5

Comment noted.

MR-6

The patch size analysis has been refined for the FEIS and your comments were considered during this refinement.

Comments of Mike RievesResponses to Mike Rieves

MR-7	MR-7	2		Comment noted.
MR-7	MR-8			As noted in the response to MR-6, the patch analysis has been refined. Figure 4-152 has been appropriately revised. No documentation is provided for the under-reporting of harvest data.
MR-8	MR-9			Comment noted. The FEIS conclusions have been revised based on refinements in the analysis.
MR-8	MR-10			The Forest Service does not ignore the non-timber harvest values of Indian Creek drainage. It is the purpose of this EIS to clearly display the effects of timber harvest on all resources and values of the Project Area. Additional harvest in the Indian Creek drainage and roading into adjacent State lands are alternatives under analysis. Other alternatives under consideration would avoid further harvest in Indian Creek and avoid roading on State lands.
MR-9	MR-11			Specific assessment goals have been established by ADF&G for deer with their population objectives for each WAA. These are presented under Effects on Management Indicator Species in the Wildlife section of Chapter 4. The Forest Service also has the goal of maintaining sufficient populations to avoid significant restrictions on subsistence activities for those species used for subsistence purposes. The Forest Service also has the goal of avoiding effects on threatened, endangered, and sensitive species. No specific goals have been established for other species on a WAA basis by ADF&G or the Forest Service, except for the maintenance of well-distributed, viable populations. Habitat capability models have been developed as one measure of the effects of land management actions on wildlife habitats and populations. For a detailed discussion of the MIS, see Forest Service Publication R10-TP-2, "Management Indicator Species for National Forest Lands in Alaska." For further information on threatened, endangered, and candidate species, see Appendix J, the Biological Assessment.
MR-10				
MR-11				

- Page 4-92: Indian Creek; wildlife, subsistence, and other values of this area were identified circa 1984, and in '89-94 KPC FEIS by Rieves and Domenowski; ensuring ROD was appealed by Rieves due, in part, to planned intrusion into the Indian Creek drainage; FS blundered handling of appeal egregiously; Deer hab. cap. not adjusted for patch size; harvest data is under-reported; combined effect is a reasonable 'significant' porosity of a shortfall NOW - on the order of a 100 deer overharvest @ 10% level; Year 2054 is irrelevant.
- Fig. 4-28: Harvest EIS conclusion; The statement "In summary - - - - -" is unwarranted and not supportable by appropriate data, at least w.r.t. deer.
- Page 4-174: - note again above paragraphs for Fig 4-28 and Table 4-54, and Tables 3-63, 3-64 - the Polltulet Project time interval (3 yrs) is too short to have broad conclusions on, esp. when referenced to '94 Aitl conditions.
- evaluation criteria rely "--- heavily upon the use of wildlife habitat capability models [HCM's] as well as upon ADF&G hunter survey data," (Cpg. 4-152). HCM's at best, generate indexes of habitat suitability (HIS's), and without "ground-truthing", verification is not possible as regards occupation by a given specie.
- FS continues to ignore non-timber harvest values of Indian Creek drainage, and even proposes roading into State land.

Brief comments on MIS's, Biodiversity, and Viable PopulationsMIS's

While mandated for inclusion in a Forest Plan, the DEIS's (and SDEIS's) treatment of MIS's fails to describe clearly the assessment goals intended and the criteria used to define corresponding achievement. Considering the large scale perturbation on the Tongass's ecosystems due to timber harvest, it is clear that



MR-11  
(cont.)

various species' population structures and distributions (and possibly genetic make-up), as well as community structures or functioning and ecosystem processes have been, and are currently being altered significantly. What the indicators chosen are expected to 'indicate' is not defined, except possibly a measure of their own numbers. Those species which are hunted or trapped confound any useful ecological indicator assessment; and the T, E, and S species should more properly be included in the MIS category.

MR-12

Comment noted. The sections on biodiversity in the FEIS have been revised after taking into consideration these and other comments. Also see responses to ADFG-4 and ADFG-14.

Biodiversity and Viable Populations

MR-12

Biodiversity cannot be quantified with an enumeration of patch sizes, numbers, and distribution. Explicit empirical data must be acquired in order to express alpha and beta diversities, and make some extrapolations to gamma diversity. A significant problem with the Tongass forest management is that no substantial data base exists for habitat attributes or wildlife abundance and distribution; and this is compounded by the rapidity of fragmentation of ecosystems. If, any possible fiducial data set is constantly changing with the cut. In this regard, it should be pointed out that some species may inevitably be 'discovered' as T, E, or S only after the fact (ex. Northern Goshawk).

As with other plan considerations, the use of habitat capability models as being a reliable specie population size generator is not valid unless densities are "measured". This will bear directly on the proper definition (absent in plan) of a minimum viable population (MVP). Noted by their absence also are any explicit considerations of demographic, environmental, and genetic stochasticities. In view of the extensive habitat fragmentation taking place, inclusion of such factors is imperative if meaningful projections of population sizes and viability, and biodiversity are to be made. Related to these considerations, it is noted that the DEIS is incomplete since no dedicated mapping is presented depicting Habitat Conservation Areas (HCAs) and their connectivities.

Comments of Mike RievesResponses to Mike Rieves

MR-13	4. MR-13	Refer to responses to JB-2 and GRP-10.
MR-14	MR-14	Corrections have been made regarding map locations for these recreation sites. The future campground would be located near the Harris River, not near Maybeso Creek.
MR-15	MR-15	The recreation visitor day estimates presented in the subject table are estimates by Craig Ranger District personnel based on professional judgement. Staff estimates are based on historic and recent observations of use.
MR-16	MR-16	Many recreationists participate in more than one recreational activity in a recreation day (defined as the use of a National Forest site or area of land or water by one person to participate in one or more activities during a 12-hour period). For estimating purposes, the primary activity the recreationist is involved with is identified and used as the basis for recreation visitor day estimates. The estimates are approximate, but do allow general comparisons among recreational activities to be made.
MR-17	MR-17	Comment noted.
MR-18	MR-18	Helicopter logging is a common and widespread practice throughout the western United States and Canada. Although associated noise levels are high, the impact duration is short. Wildlife mitigation measures (see Mitigation Measures W-8, W-11, W-12, and W-13) have been developed and are prescribed to minimize or avoid noise impacts to sensitive species during sensitive periods.
MR-19	MR-19	Comment noted.

Finally, the DEIS should also include likely effects of the extensive harvesting of old growth by Native Corps, on lands adjacent to the Project Area; and the set of FS Projects over P.O.W. Is. should be synthesized w.r.t. additive consequences of timber harvest activities.

Recreation

— Table 3-74 & Fig. 3-32 : Sites 51100 & 51052 are given incorrect map location

Re Site no. 51051 ; It is a priority in the Hollis community that no campground be located at the Maybeso CK.

— Table 3-75 : The Activity 'sets' are not all independent as several set intersections are not zero by inspection, the given Total Est. Rec. Visitor Days is an over-estimate.

Other Environmental Considerations — Helicopter Logging

The excessive consumption of one non-renewable resource (fuel @ 8 Gal/MGF) to facilitate the destruction of a quasi-renewable one is not acceptable. The associated harvest units should not be scheduled in any case.

Additionally, there is no data given to demonstrate that no significant stress is induced in wildlife due to the intense sound levels. This noise pollution is also of concern to those Hollis residents not afflicted with rural defects.

In summary, by all indications the FS does not appear inclined to comply strictly with ANILCA-810, NEPA, and NEPA. Accordingly, it is anticipated that further, more vigorous presentations of most of the foregoing will be entertained in the near future.

Distribution : Hollis Council  
SCLOF, Juneau ; ADF&G, Juneau

Mike Rieves  
Hollis, AK

November 24, 1993

Mr. David Rittenhouse, Forest Supervisor  
U.S.D.A. - Forest Service  
Ketchikan Area - Tongass National Forest  
Federal Building  
Ketchikan, Alaska 99901

Re: Polk Inlet Draft EIS

Dear Forest Supervisor Rittenhouse:

Please consider the following comments regarding the Polk Inlet Draft Environmental Impact Statement.

MS-1 I support the selection of Alternative 4 as the preferred alternative. The Forest Service should take all steps necessary to insure that this EIS is finalized and implemented as soon as possible. I note that wildlife, fish habitat and water quality will not be harmed or impaired by the implementation of any of the alternatives.

MS-2 Since 66% of commercial forest land on the Tongass is already off-limits to timber harvest, I fail to see that visual quality is an overriding concern. Moreover, caves and the karst system will be adequately protected with the utilization of care and common sense.

MS-3 In closing, I urge the Forest Service to select and implement Alternative 4 as quickly as possible in order to provide timber in a timely manner to Southeast Alaska's dependent mills and suppliers, and in turn support the economic infrastructure of Southeast Alaska.

Sincerely,



Mitchell A. Seaver

MAS:ce

MS-1 Comment noted.  
MS-2 Comment noted.  
MS-3 Comment noted.



## Comments of Cathy Starkweather

### Polk Inlet Subsistence Comments

Thank you for the meeting in Walla, it was a success

CS-1

Maybe your folks should review the need for your study. Does it include your other studies of other areas of use? Are your methods from the '90s or the 50s? Is it time to cut the contract in half or less? Seems the "contract" is in control not us.

CS-2

Sometimes we feel we don't count in the decision making process. Are you just giving us lip service?

CS-3

Our living forest is so very important to that planet, do you know how important it really is?

Be careful F.S. you're holding the bottom of a burning match.

Please remember to provide your name and address on the reverse side.

## Responses to Cathy Starkweather

CS-1

The KPC contract is a legally enforceable agreement between KPC and the U.S. Government. Changing the contract requires an act of congress.

CS-2

The Forest Service considers public input to be very important to the process of timber sale planning. Chapter 1 describes the public involvement process followed for the Polk Inlet Project. An example of how public input has influenced the Polk Inlet Project can be seen in the development of alternatives (see Chapter 2). Input received during scoping was the major factor influencing the alternative frameworks. Further, selection of the preferred alternative was heavily influenced by public input.

CS-3

Comment noted.

WALTER W  
~~Polk Inlet~~ Z. Shuham  
841 MAIN STREET  
KETCHIKAN, ALASKA 99901

WS-1      Comment noted.

11/10/93

U.S. Fish & Wildlife  
Service  
P.O. Box 615

Re: Mr. Ron Pittman

This letter is to show my support  
for Alternative 4.

While my major concern is to see to it  
that the U.S. Fish & Wildlife Service  
supply of timber available to KPC,  
this alternative also seems to provide  
substantial benefits to the State  
of Alaska and to the U.S.

Very truly yours,

Walter W. Shuham  
WALTER W. SHUHAM

WS-1

## Comments of Tom Twitchell

## Responses to Tom Twitchell

TT-1	Comment noted.	TT-1	Comment noted.
TT-2	Comment noted.	TT-2	Comment noted.
TT-3	Refer to response to AFA-3, part b.	TT-3	Refer to response to AFA-3, part b.
TT-4	Comment noted. Limiting helicopter logging is an admirable goal for economic reasons, but if only 10% of the units could be helicopter-logged, differences among alternatives would be very limited due to the need to satisfy purpose and need. In addition, future entries would necessarily include a much higher percentage of helicopter logging.	TT-4	Comment noted. Limiting helicopter logging is an admirable goal for economic reasons, but if only 10% of the units could be helicopter-logged, differences among alternatives would be very limited due to the need to satisfy purpose and need. In addition, future entries would necessarily include a much higher percentage of helicopter logging.
TT-5	Comment noted.	TT-5	Comment noted.
TT-6	Refer to response to AFA-3, part c.	TT-6	Refer to response to AFA-3, part c.
TT-7	Comment noted.	TT-7	Comment noted.
TT-8	Inclusions of muskeg and low volume areas are found within harvest units. If such areas occur along the perimeter, the unit boundary was adjusted to avoid them. When such areas occur well within the harvest unit, removing them from the harvest unit would be counter-productive and limit management options.	TT-8	Inclusions of muskeg and low volume areas are found within harvest units. If such areas occur along the perimeter, the unit boundary was adjusted to avoid them. When such areas occur well within the harvest unit, removing them from the harvest unit would be counter-productive and limit management options.
TT-9	Refer to response to ADFG-41.	TT-9	Refer to response to ADFG-41.
TT-10	Refer to response to AFA-3, part g.	TT-10	Refer to response to AFA-3, part g.
TT-11	Comment noted.	TT-11	Comment noted.

DEAR DAVE

OCT. 28, 1983

TT-1 PLEASE CONSIDER MY COMMENTS ON THE POLK DRAFT ENVIRONMENTAL STATEMENT. I WANT TO GO ON RECORD AS IN FAVOR OF CONTINUING TO MEET THE LONG TERM CONTRACTUAL OBLIGATIONS FOR TIMBER SUPPLY. THE U.S.F.S. SHOULD OBEY THE DIRECTION OF CONGRESS AND DO THE JOB THEY ARE PAID TO DO.

I DISAGREE WITH YOUR AFFECTED ENVIRONMENT REPORT BUT THINK THAT THE TIMBER SUPPLY IS TOO IMPORTANT TO DELAY BY HAGGLING OVER THE IMPACT STATEMENT. FOR NOW I WILL TRUST YOU TO DO THE JOB AT HAND.

TT-2 1. ALTERNATIVE # 4 IS A BETTER CHOICE BASED ON THE \$ OF RETURN TO THE STATE AND FEDERAL GOVERNMENT. THE DATA USED IN DETERMINING TIMBER SUPPLY AND UNIT LOCATION IS NOT GOOD. IF YOU WILL DIRECT THE CRAIG RANGER DISTRICT STAFF TO USE REASON WHEN APPLYING R.O.D. TO FIELD WORK, I THINK THE PLANNED HARVEST CAN BE MEET.

TO FURTHER IMPROVE AND LOWER OPERATING COSTS I SUGGEST:

TT-3 A) MAXIMIZE THE TIMBER HARVESTED FOR NEW ROAD CONSTRUCTED. I RECOMMEND EXCEEDING 2.225 MILLION BOARD FEET PER MILE WITH OUT COUNTING HELICOPTER UNITS.

TT-4 B) USE HELICOPTER YARDING ON NO MORE THAN 10% OF THE AREAS. PLAN HELICOPTER UNITS TO YARDING DISTANCES UNDER ONE MILE. PLAN UNITS TO TAKE ADVANTAGE OF CONVENTIONAL LOGGING METHOD FOR PART OF THE UNIT. LOOK FOR OTHER WAYS TO CUT COST AND IMPROVE \$ RETURNS TO STATE AND FEDERAL GOVERNMENTS.

TT-5 C) INSURE THAT THE CHANGES IN UNITS SUCH AS LEAVE AREAS AND PARTIAL CUTS DO NOT REDUCE THE AMOUNT OF TIMBER OFFERED FOR HARVEST AS JOBS ARE DIRECTLY EFFECTED.

TT-6 D) ROAD CONSTRUCTION IS A MAJOR COST, SO PLEASE DO NOT REQUIRE ROADS TO BE BUILT TO A HIGHER STANDARD THAN NECESSARY TO SAFELY REMOVE THE HARVEST VOLUME.

TT-7 E) YOUR PLANNED REQUIREMENT OF NEW HARVESTING TECHNIQUES WILL RAISE EXPENSES OF WORKING FOR THE FOREST SERVICE AS WELL OUR INDUSTRY AND LOWER RETURNS PLEASE CONSIDER THAT WORKING AROUND LEAVE TREES AND AREA OF LEAVE TIMBER WILL INCREASE ALL THE COST AND LOWER THE \$ RETURNS FOR EVERYONE.

TT-8 F) PLEASE INCLUDE ONLY MERCHANTABLE TIMBER LANDS IN YOUR AREAS TO BE HARVESTED. TIMBER ON MUSKEGS AND SCRUB TIMBER (BELOW 8 MBF PER ACRE) THAT YOU INCLUDE IN SIDE OF HARVEST UNITS NORMALLY IS NOT HARVESTED.

TT-9 G) DO NOT USE THE R.O.D. MAPS AS A FINAL FOR A UNITS SIZE AND LOCATION. MANY TIMES AREAS NEAR INTENDED UNITS ARE BETTER MANAGED WHEN THEY CAN BE INCLUDED.

TT-10 H) PLEASE DO NOT PLAN NEW LOG DUMP SITES FOR A FRAME OR BARGES WHICH REQUIRE BULK HEADS AND DISTURB A LARGE AREA. LOW COST, LOW IMPACT FACILITIES HAVE BEEN USED WITH MUCH SUCCESS.

TT-11 I) A STEADY AND AMPLE TIMBER SUPPLY IS ESSENTIAL FOR EXISTENCE OF MILLS AND JOBS. PLEASE COMPLETED YOUR EIS PROJECTS AS QUICKLY AS POSSIBLE TO PROVIDE TIMBER IN A TIMELY MANNER TO SOUTHEAST ALASKA'S REMAINING HILLS.

THANK YOU

*Tom Twitchell*



95 Bentley Circle  
Shelby, Alabama 35143  
November 1, 1993

Forest Supervisors  
Ketchikan Area  
Tongass National Forest  
Attention: Polk Inlet EIS  
Federal Building  
Ketchikan, Alaska 99901

Gentlemen:

We are writing concerning the Draft Environmental Impact Statement (EIS) for the Polk Inlet Project Area. We appreciate being asked to express our views.

We have built a cabin on Lot 11, Cholmondeley Sound Subdivision, Plat No. 85-35, Ketchikan Recording District. We typically will spend a minimum of seven or eight full weeks per year at our cabin in Cholmondeley Sound.

We believe that the forest and environment in Cholmondeley Sound has suffered enough. While we know the Forest Service is not to blame for many of the excesses perpetrated on the area by the native corporations, the Forest Service does, we think, have a duty to do what it can to preserve the beauty and diversity of Cholmondeley Sound - as well as all of the Tongass National Forest.

The native corporation property in and around Dora Bay, Divide Head and other areas have virtually destroyed the forest. The only substantial remaining old growth forest at the end of the West Arm has now been deeded to another native corporation and we fear what results there will be.

The drainages in and near Cannery Creek in the West Arm of Cholmondeley Sound and Sunny Cove have some of the few protected old growth areas left. It appears that your plans are simply to do everything you can to reach every possible old growth forest. Can this possibly be justified?

We would like to see you leave all of the remaining old growth forest untouched. We oppose any further timber cutting or development in Cholmondeley Sound. We particularly oppose Alternative Number 4 which would put a road and timber haul out area right along the East bank of Cannery Creek - a great deal of damage to

BAW-1

Comment noted.

BAW-1

Comments of Billy & Ann Whitten

Page 2

November 1, 1993

BAW-1  
(cont.)

reach a very small stand of old growth timber. We do know, however, that the Forest Service timber cutting practices would not damage the area as much as the native corporations would do if they got the property. The only way we would think the cutting of any further timber would be justified would be if it would prevent the native corporations from obtaining ownership of the property. If you have been in Cholmondeley Sound over the last few years, you will know that the use of the area by the humpback whales, bear and deer has diminished. There is much litter and contamination which flows from the extensive activity of the native corporations there.


BAW-2

On a related point, in the future, would it not be possible for the Federal Government to reserve small pockets of old growth timber at frequent intervals throughout the areas deeded to the native corporations? This would insure that both the fauna and flora had a "staging area" to reoccupy and replenish the native lands after they are clear cut. Perhaps you could even reason with the native corporations to leave these pockets of old growth timber at intervals through the cutting area.

We thank you for all that you do for us and others who love the Tongass National Forest.

Wishing for you the best possible decision, we are

Yours truly,



Billy A. Whitten, Jr.



Ann Whitten

/BAW/AW

BAW-2

Responses to Billy & Ann Whitten

The Forest Service has no control over which lands are selected by the Native Corporations. However, the vast majority of the Native land selections authorized by the Alaska Native Claims Settlement Act on the Tongass National Forest have been made and about 90 percent of the authorized lands have been conveyed.

November 24, 1993

Mr. David Rittenhouse, Forest Supervisor  
U.S.D.A. - Forest Service  
Ketchikan Area - Tongass National Forest  
Federal Building  
Ketchikan, Alaska 99901

Re: Polk Inlet Draft EIS

Dear Forest Supervisor Rittenhouse:

Please consider the following comments regarding the Polk Inlet  
Draft Environmental Impact Statement.

WW-1 I support the selection of Alternative 4 as the preferred alterna-  
tive. I believe that the Forest Service should take all steps  
necessary to insure that this EIS is finalized and implemented as  
expeditiously as possible. I note that wildlife, fish habitat and  
water quality will not be harmed or impaired by the implementation  
of any of the alternatives.

WW-2 With regard to visual quality, I believe that such is not a concern  
since 66% of commercial forest land on the Tongass is already off-  
limits to timber harvest. Moreover, caves and the karst system  
will be adequately protected with the utilization of care and  
common sense.

WW-3 Mudslides should also not be a concern vis a vis timber harvest.  
As I'm sure you are aware, recent studies have confirmed that  
there are much larger and more destructive landslides where there  
has been no harvest.

In closing, I urge the Forest Service to select and implement  
Alternative 4 as quickly as possible in order to provide timber in  
a timely manner to Southeast Alaska's dependent mills and suppli-  
ers, and in turn support the economic infrastructure of Southeast  
Alaska.

Sincerely,

  
Will Woodell

WW:ce

WW-1 Comment noted.

WW-2 Comment noted.

WW-3

See response to SEAC-26. Mass wasting is a concern in relation to timber  
harvest. The factors that contribute to mass wasting and its effects are  
discussed under Surface Erosion and Landslides in the Soils sections of  
Chapters 3 and 4.



## Comments of Roger Ziesak

November 24, 1993

Mr. Dave Rittenhouse  
Forest Supervisor  
U. S. Forest Service  
Tongass National Forest  
Ketchikan Area  
Federal Building  
Ketchikan, Alaska 99901

Attn: Polk Inlet EIS

Dear Dave:

I appreciate this opportunity to comment on the Polk Inlet DEIS. This is a well written document which clearly addresses the issues. I have a number of concerns and comments as outlined below.

### General Comments

RZ-1 | 1) I favor Alternative 4 based on the projected lower operating costs, the reduced amount of helicopter yarding and the projected returns to the Forest Service and the State of Alaska. At the end of my comments are suggestions to improve the economics and overall viability of Alternative 4.

RZ-2 | 2) Helicopter units need to be operable from a safety standpoint. Very steep slopes create a significant safety hazard due to unstable footing for ground crews in the rotor wash and obstacles being too close to the helicopter as it attempts to hook up to a load. Units that on average are extremely steep as a whole (say 70%+) should not be considered unless the worst areas are left as leave islands or are deleted.

RZ-3 | 3) If the Forest Service requires new types of harvesting techniques then appropriate costs must be developed. These costs should show the added expense of working around leave trees and leave islands as well as not being able to remove all of the usable volume from a setting. The operator should not have to bear the cost of this designed inefficiency.

RZ-4 | 4) At 27 MBF/Acre the average volume per acre used for cumulative analysis seems high given the high percentage of cedar type units and the large amount of partial cutting called for. Volumes should reflect the estimate of volume removed, not the total volume/acre.

RZ-5 | 5) When calculating volumes and unit acres all acres and volume below the 8 MBF/ac Class 4 threshold should not be counted.

## Responses to Roger Ziesak

Comment noted.

RZ-1

RZ-2

We agree that helicopter units need to be operable from a safety standpoint. Many site-specific factors need to be considered. As you indicate, unsafe areas can often be left as leave islands or deleted from the unit. To insure safe working conditions the logging contractor contact with the State of Alaska Safety Compliance Officer should be consulted. He will come to the job site free of charge to evaluate areas of concern in regards to safety issues and conduct safety training sessions.

Comment noted.

RZ-3

RZ-4

Volume reductions associated with proposed silvicultural prescriptions are small, on the order of 5 percent overall. This volume is not permanently lost for the purpose of cumulative analyses; it is to remain unharvested during the current entry, but not necessarily in future entries.

RZ-5

Many areas mapped as containing low volume were field-verified to have greater than 8 MBF/acre. Many other areas were excluded from harvest units because they contained volumes below this level. Small inclusions of low volume acreage may be found within harvest units. When the harvest units were cruised, those areas of low volume were sampled as well.

Mr. Dave Rittenhouse  
November 24, 1993  
Page 2

- 6) Logging systems specified in this EIS should be only a guide and not a requirement. As long as the Purchaser meets all mitigation requirements they should be allowed to use any machine they want.
- 7) Any new LTF sites should be low cost, low impact, low angle slides.
- 8) Road closures and other transportation and recreational access activities should be the responsibility of the Forest Service and not the purchaser or the purchaser should be given purchaser's credit for doing this extra work at the purchaser's option.
- 9) For isolated areas on the project area the maximum allowable entry within the scope of this project should be scheduled to create viable economic offerings.
- 10) For each alternative to be properly evaluated the number of temporary road miles should be noted.
- 11) I strongly support the continued use of BMP's for soil, fisheries, water, wildlife, and cave protection.
- 12) Where soil conditions permit, the BMP should be changed to allow shovel logging on slopes in excess of 20%.
- 13) To avoid problems, it is essential to establish clearance through the NEPA process for OSHA mandated guyline circles in sensitive and non-sensitive areas.
- 14) Visual prescriptions should be based on local preference and not national standards. Local people are not offended by seeing clearcuts in their viewscape.
- 15) Subsistence use areas should be guided by specific comments about specific areas not broad brush applications.
- 16) Canada geese nesting (several nests) areas on Heceta Island were noted in muskeg/scrub areas within a few hundred yards of an active logging road. The geese did not appear stressed and goslings were successfully reared. Before timing restrictions and reductions in suitable habitat are predicted a better understanding of what constitutes a threat to geese should be undertaken. Do not require timing mitigation when it is obviously not necessary.

Specific Comments

Page 2-29 Figure 2-2 - It is not clear what kind of stream this figure is referring to, nor can I tell what sort of risk is being referred to.

- RZ-6 You have correctly stated the intent of the logging systems specified in the EIS. When a sale is offered, it is appraised with a feasible logging system. If the Purchaser feels another system is feasible, he can request a change using normal timber sale contract procedures. Assuming all resource objectives can be met, a contract change can be made including appropriate changes in stumpage rates.
- RZ-7 New LTF's will be designed to best meet site-specific objectives.
- RZ-8 Comment noted.
- RZ-9 Comment noted.
- RZ-10 Temporary roads are included in the analysis as locals.
- RZ-11 Comment noted.
- RZ-12 BMP 13.9 states that shovel logging may occur on slopes up to 20%. Shovel logging may occur on slopes > 20%, but only after interdisciplinary review.
- RZ-13 The establishment of clearance through the NEPA process for OSHA mandated guyline circles is a unit layout issue and is beyond the scope of an EIS. Dead trees and snags should always be felled within guyline circles for safety reasons. Also see response to RZ-2.
- RZ-14 The visual management guidelines are based partly on sensitivity levels of the predominant forest users. The visual management system recognizes there are different sensitivity levels and preferences and therefore assigns a higher sensitivity level to those areas likely to be visited by persons with a high level of concern for the visual resource. The highest level of management due to visual concerns will occur along Visual Priority Routes and Use Areas identified in the proposed forest plan revisions. Based on comments received during scoping, there is not a consensus among local people on viewing clearcuts.
- RZ-15 Comment noted.

## Comments of Roger Ziesak

Mr. Dave Rittenhouse  
November 24, 1993  
Page 3

- RZ-18** | Page 2-36 Mitigation F4 - For this to work the purchaser should have input into the selection and location of tailholds based on machine type. This flexibility is essential and should be an authority given to the sale administrator so they can address problems encountered by the purchaser.
- RZ-19** | Page 2-37 Mitigation F10 - Fish timing windows cannot be too restrictive. The ability of the purchaser to operate the sale in a timely and efficient manner should be a factor.
- RZ-20** | Page 2-37 Mitigation W1 through W5 -
- 1) Fingers and all leave islands on clumps should be designed to conform to the direction of cable yarding.
  - 2) Suitable cost allowances should be developed.
  - 3) Determination of what is a safe snag should be up to the operator and sale administrator.
  - 4) Unit volumes should reflect only the volume removed and not what is required to be left behind. Additional units should be added to compensate.
- RZ-21** | Page 2-37 Mitigation W9 - If Goshawk guidelines are implemented then any volume dropped or deferred must be replaced from a contingency pool developed and approved in this EIS.
- RZ-22** | Page 2-38 Mitigation V4 - Any partial cutting strips should be no more than a tree length in width or they should allow corridors to get logs out.
- RZ-23** | Page 2-38 Mitigation V5 - Complete screening of harvest units for visual reasons should not be mandatory. People in the vicinity know they are in a timber harvest area and do not resent clearcuts. If clearcuts are a concern to them they should use wilderness areas.
- RZ-24** | Page 3-5 It is not true that the pulp mill is a large air pollution source. This needs to be corrected.
- RZ-25** | Page 3-28 It should be noted that even after the intensive harvest in Maybeso creek drainage the stream temperature never approached fatal levels.
- RZ-26** | Page 3-31 Class I fish habitat that is identified above barriers should not be considered for full protection if only pink salmon would use it. This is because enhancement projects are not pursued if only pink salmon benefit.

## Responses to Roger Ziesak

- RZ-16** Comment noted. The mitigation measure you refer to is designed to allow flexibility based on site-specific conditions.
- RZ-17** The stream classes addressed by the figure are identified in the text that describes the figure adjacent to it. In the case of road crossings, the stream classes are noted in the figure.
- RZ-18** The intent of this mitigation measure is to minimize disturbance to muskeg areas. It has been incorporated into the proposed design of specific harvest units and by recommending appropriate logging systems. Tailhold needs have been addressed and special needs noted on unit cards. The intent is not to restrict flexibility, but to provide resource protection while assuring logging feasibility.
- RZ-19** Refer to response to ADFG-37. Timing windows are developed with ADF&G for the purpose of resource protection.
- RZ-20** These factors have been considered to the degree practical given the feasibility level of analyses presented here. Unit volumes have been reduced to reflect retention.
- RZ-21** A contingency pool for replacement of volume which is dropped or deferred after the ROD is not planned.
- RZ-22** This mitigation measure refers to what is defined as a Type B clearcut in this EIS. The Vegetation and Timber Resources section in Chapter 3 defines Type B clearcuts and limits the partial cutting to 50-100-foot strips along setting boundaries.
- RZ-23** Refer to response RZ-14.
- RZ-24** Refer to response to OG-16.
- RZ-25** Comment noted.
- RZ-26** Comment noted.



Mr. Dave Rittenhouse  
November 24, 1993  
Page 4

RZ-27	Page 3-38	It should be noted that at one time the policy of removing LWD from streams and logging to the banks was acceptable and encouraged by the Forest Service and Alaska Department of Fish & Game.	RZ-27	Comment noted.
RZ-28	Page 3-105	1) Goshawk information is mostly opinion at this point. Factual information is needed so that large blanket type protection measures, which may not be useful, are avoided. 2) Also, because of this lack of credible information the Goshawk should not be an indicator species.	RZ-28	Comment noted. The goshawk is not used as a Management Indicator Species. The northern goshawk is listed as a Category 2 Candidate species for threatened/endangered status by the U.S. Fish and Wildlife Service.
RZ-29	Page 3-128	It should be noted that camps established for logging and/or road building will be either a land camp or a floating camp. At this point in the process it is too early to have a preference.	RZ-29	The EIS does not restrict any future camps to be floating camps or land camps.
RZ-30	Page 3-133	1) In table 3-47 are the numbers of jobs for fishing and tourism listed in terms of year-round jobs? For example, a job that only lasts 6 months should be considered 0.5 jobs for this analysis. 2) Also, government jobs directly related to each of these industries should be included under direct jobs.	RZ-30	The jobs described in Table 3-47 have been adjusted to account for the seasonal nature of work activities. The format of the EIS has been designed to present site-specific environmental analysis and regional economic effects. No detailed breakdown of government jobs attributed to specific industries was readily available.
RZ-31	Page 3-190	Second growth should be considered the same as old growth when it reaches 15 years old when considering it for visual effects.	RZ-31	The site productivity, topography and viewpoint are major factors that influence when second growth visually approximates old growth. As stated on page 3-190 of the DEIS, there is little visual contrast between the 28-year-old second growth and adjacent old growth. On other sites, second growth that is at least 20 years old, contrasts in height, color and texture with the appearance of old growth.
RZ-32	Page 4-10	Normal yarding with no suspension requirements typically has soil disturbance in the 8-10 percent range and not the 12 percent noted.		Table 3-73 is a gross indicator of the amount of alteration that previously has occurred in the major viewsheds. Each viewshed was analyzed and in some instances it was suggested the EVC be changed to a less altered condition because the second growth had attained the height and other visual characteristics of old-growth.
RZ-33	Page 4-10	Under road construction acreage there are two problems: 1) Road width - the 75 foot width used may work for clearing limits but the actual width of land taken out of production is more like 35-40 feet. 2) Due to limitations on size for visuals, etc., rock pits typically build only 1-1.5 miles of road. The acreage used though is probably correct due to requirements for shorter backwalls, etc.	RZ-32	Comment noted.
RZ-34	Page 4-12	The concern over logging of high MMI soils can and has been adequately addressed with proper suspension requirements. What must be factored in is the need for layout crews to leave adequate lift and tail trees and not put unit boundaries right up to the muskeg edge.	RZ-33	The 75-foot-width was assumed for this project because of the higher than average number of roads along steep slopes requiring large cuts and fills. Assuming a 75-foot-wide disturbed corridor does not seem to overestimate the disturbance corridor when this factor is considered.
RZ-35	Page 4-31	The State standard for maximum temperatures in streams is noted as being 43° fahrenheit. This seems low in that groundwater temperatures are normally in the 45-55° fahrenheit range.	RZ-34	Comment noted. Refer to responses to ADFG-5 and SEAC-26.
			RZ-35	The stated temperature should read 68 degrees Fahrenheit, not 43 degrees. The text has been changed.

## Comments of Roger Ziesak

Mr. Dave Rittenhouse  
November 24, 1993  
Page 5

- RZ-36** | Page 4-37 LWD that is introduced in "pulse" fashion from a buffer blowing down, etc., decays at varying rates. Some logs will last decades, some much shorter so even doing a "pulse" event the LWD would be, over time, distributed in a natural fashion.
- RZ-37** | Page 4-42 When evaluating potential risk to anadromous fish populations it should be noted that a relatively high percentage of streams in Southeast have been at or above capacity. The normal die-offs, etc., that naturally occur to correct this should not be considered a result of timber harvest entry for this EIS analysis.
- RZ-38** | Page 4-64 To require all units to have some type of mitigation to preclude a total clearcut is presumptive on the part of the Forest Service and assumes that Forest Service crews can successfully lay out units with these prescriptions. This may not be the case given the complexity of the designs. The type of yarding system a setting is laid out for should be yarders that are currently being used in Southeast. A high degree of flexibility should be given to the Forest Service sale administrator to make adjustments or deletions of leave trees for safety, logability and other reasons. These prescriptions should not be set in stone thereby putting the purchaser at a safety, operability, or financial risk.
- RZ-39** | Page 4-69 Cumulative effects of harvest on POW. Tentatively suitable acres in LUD I, LUD II, and other set asides (RNA's, etc.) should be included in the total tentatively suitable acres. This will tell the real story about the amount of timber left on Prince of Wales Island.
- RZ-40** | Page 4-126 Floating camp sites that have been acquired for harvest on private lands may not be available to purchasers of National Forest timber sales. Given the complexity of the permit process it is unlikely this option would be available due to the perceived risk to the permit holder.
- RZ-41** | Page 4-131 Economics must be calculated on two levels:  
1) For the alternatives as a whole and,  
2) each isolated group of units (Little Coal Bay, McKenzie Inlet, etc.).  
These small unit groups must be economical in and of themselves to avoid below cost sale situations. If they are not above cost then changes should be made or the area should be dropped from this entry.
- RZ-42** | Page 4-145 Current R-10 helicopter cost estimates are too low. At a minimum all cost estimates should use method 2.

## Responses to Roger Ziesak

- RZ-36** | Comment noted.
- RZ-37** | Comment noted.
- RZ-38** | Note that clearcut Type A, which is the most commonly prescribed harvest system in this EIS, allows for substantial flexibility. The other types have less flexibility, but the layout crews and sale administrator have considerable flexibility because leave trees are not marked. It should also be noted that logging equipment used in the future in Southeast Alaska may necessarily differ, somewhat, from that used at present, just as logging equipment of the present differs from that used in the past.
- RZ-39** | Acres in LUD I and II and other set-aside areas are included under total old growth in this section. However, even though many of these acres are suitable, by definition they are not available, and so are not included in acres of "suitable and available CFL."
- RZ-40** | Comment noted.
- RZ-41** | Economics were calculated for logical geographic areas in the DEIS, as you suggested. Also as you suggested, results for these geographic areas were aggregated in different combinations to form the alternatives in the DEIS. In this way, the economic effects are clearly displayed.
- RZ-42** | The DEIS and FEIS present cost estimates using two methods.

Page 4-216 Cumulative visual effects would be significantly moderated under clearcut mitigation proposed for virtually all the units in this EIS. To the uninitiated there would be no real difference. Visuals should be of secondary importance when these mitigations are used.

Following are my specific comments for improving Alternative 4:

- 1) Combine Units 612-202, 204 creating one larger unit to improve economics. If not feasible to combine then units should be enlarged.
- 2) Unit 612-207 should be expanded to the north and west. Also the estimated volume per acre is high.
- 3) Enlarge Unit 612-213 along south end above road to make a logical and safe setting.
- 4) Units 612-216 and 217 should be combined. This is a low use area for all other resources and this will create a more economical unit.
- 5) Drop Unit 612-230 - too much road for virtually no merchantable timber.
- 6) Add Units 613-206, 208, and 234.
- 7) Units 613-219 and 221 should have partial cuts allowed between the unit and the road to allow removal of the tallest overstory which may present a safety hazard.
- 8) Enlarge unit 613-222 by adding a setting to the south.
- 9) The estimate of volume/acre for 613-254 is too high.
- 10) Drop Units 613-280 and 613-283.
- 11) Add lower two thirds of Unit 674-211 for helicopter logging.
- 12) Unit 674-265 should be enlarged to the north and south. This can be a partial cut with corridors - remove trees 20" and up, for example.
- 13) Unit 674-283 must be enlarged to be economic. Add a setting along proposed road and enlarge the currently proposed setting.
- 14) Unit 620-209: Southern half of unit contains large areas of 15-20 year old blowdown with second growth covering it. This portion may have to be dropped. Expand unit to the north. This unit is definitely not 52 MBF/ac.

RZ-43	The clearcut mitigation methods would significantly reduce the visual impacts of timber harvest; however, there still would be some contrast in color and texture of the harvest units. In land use designations other than scenic viewed, visuals are relegated lower importance than the primary management objectives; however, the visual resources still must be considered.
RZ-44	Combining units 612-202 and 612-204 would not improve the economics as the area between these two units is not commercial forest land (CFL). Refer to response to OG-31.
RZ-45	Refer to response to OG-31. Timber volume estimates were based on systematic cruises of each harvest unit. About one sample plot was established for every 10 acres in each harvest unit. Sampling was not designed to be intensive enough to provide accurate volume estimates for each unit, but rather for the total volume in each alternative.
RZ-46	A statement will be added to the final silvicultural prescription to evaluate the southern-most setting for safety in yarding.
RZ-47	The majority of the area between units 612-216 and 612-217 is not CFL. Also refer to response to OG-31.
RZ-48	Even though this unit is a relatively poor unit for economics, it meets the definition of CFL. It was included in Alternative 4 because it occurs along the road system of a geographic area that was selected for inclusion based on the alternative framework.
RZ-49	The framework for each alternative was followed in the selection of units to be included. These helicopter units were not included in Alternative 4 because of long yarding distances.
RZ-50	A statement will be added to the final silvicultural prescription to evaluate partial cutting the area between the road and the unit boundary during final sale layout for safety considerations.
RZ-51	Refer to response to OG-31.
RZ-52	Refer to response to RZ-45.



## Comments of Roger Ziesak

Mr. Dave Rittenhouse  
November 24, 1993  
Page 7

- RZ-58 | 15) Unit 620-202: As much of Unit 620-360 as is possible should be added to 620-202 to create a large conventional harvest unit.
- RZ-59 | 16) Unit 620-231: Should try to shift unit to northeast along spec road and try to pick up more volume between road and creek to south where better wood is located.
- RZ-60 | 17) Unit 620-233: This unit should be dropped as it is very wet and has a lot of scrub muskeg.
- RZ-61 | 18) Unit 620-250: This unit has scrub timber, with unstable slopes and soils. It should be dropped.
- RZ-62 | 19) Unit 620-285: This has older second growth in old burn area. Trees are small to medium size but sound and well stocked. Instead of helicopter yarding unit could be roaded with only average difficulty. May be able to extend FDR 2150620 out above unit and log everything uphill.
- RZ-63 | 20) Unit 620-291: May be able to get full suspension across stream, eliminating a lot of road building. Extend unit to south along spec road to stream.
- RZ-64 | 21) Unit 620-295: Volume similar to 285. Extend unit to north to stream boundary.
- RZ-65 | 22) Units 620-307 and 620-325: Combine units and extend to north along FDR 2100.
- RZ-66 | 23) Unit 620-343: This unit could be roaded from FDR 2150200-3 to reduce road building.
- RZ-67 | 24) Unit 620-349: Pull northern boundary back away from stream to top of stream bank slope. Square off southern corner to gain deflection.
- RZ-68 | 25) Unit 619-209: Extend boundary to south.
- RZ-69 | 26) Unit 619-212: Drop this unit.
- RZ-70 | 27) Unit 619-213: Extend boundary to south.
- RZ-71 | 28) Unit 619-111: Drop - junk scrub muskeg.
- RZ-72 | 29) Unit 619-270: Extend unit boundary to west and northwest to pick up blowdown timber.
- RZ-73 | 30) Expand Units 622-203, 208; and 624-210.

## Responses to Roger Ziesak

- RZ-53 | Refer to response to RZ-48.
- RZ-54 | The ID Team decided to drop unit 674-211 from consideration in this project and recommend it be dropped from the timber base for stability and regeneration reasons.
- RZ-55 | Refer to response to OG-31. Unit 674-265 is in a visual priority use area.
- RZ-56 | See general comments regarding changing unit size. Refer to response to OG-31.
- RZ-57 | After further ID Team review, the boundary of this unit has been modified.
- RZ-58 | The original unit 620-202, which included unit 620-360, was designed for cable yarding. Field reconnaissance identified logging system limitations which resulted in the unit being split into cable and helicopter portions. The common boundary of these units could be shifted based on final layout.
- RZ-59 | Refer to response to OG-31.
- RZ-60 | After further ID Team review, the boundary of this unit has been modified.
- RZ-61 | After further ID Team review, the boundary of this unit has been modified.
- RZ-62 | This unit was proposed for cable logging in the DEIS and continues to be in the FEIS; however, if suspension cannot be achieved in unstable areas, then helicopter logging will be necessary.
- RZ-63 | The unit card has been revised to identify the possibility of suspending logs over the stream that transects the unit and avoiding the road across the stream. Also refer to response to OG-31.
- RZ-64 | Refer to response to OG-31.
- RZ-65 | Much of the area between these units is not CFL. The areas between the units and the existing road is within the 1000-foot estuarine buffer. Also see response to OG-31.
- RZ-66 | This unit is proposed for helicopter logging due to instability and potential for regeneration problems. The road is not necessary for this unit. The alternative road could be used for unit 674-283, however, and is so noted in its unit card.

RZ-67	After further ID Team review, the boundary of this unit has been modified.
RZ-68	Refer to response to OG-31.
RZ-69	This unit was included in Alternative 4 because of relatively high volume and short yarding distances.
RZ-70	Refer to response to OG-31.
RZ-71	Refer to response to RZ-48.
RZ-72	After further ID Team review, the boundary of this unit has been modified.
RZ-73	Refer to response to OG-31.
RZ-74	The framework for each alternative was followed in the selection of units to be included.
RZ-75	Refer to response to RZ-48.
RZ-76	The original boundary of this unit was already substantially modified to avoid unstable areas. The prescription calls for helicopter partial cutting of the unit, leaving behind windfirm clumps and individual trees in unstable areas (see I.D. Team Recommendations on unit card).
RZ-77	Again, the prescription for this unit calls for partial cutting of the harvest unit by helicopter, leaving behind windfirm timber in unstable areas.

## Timber Industry Form Letter

Approximately 360 individuals completed a form letter on the Polk Inlet Draft EIS circulated by the timber industry. The form letters included five pre-printed comments (two with more than one part), for which the respondents checked whether they agreed or disagreed. The comments, along with the numbers of responses given for each choice, are listed below. Several of those who completed the form letter included additional comments. These comments generally emphasized the form letter comments. A summary of the additional comments follow the specific form letter comment analysis below. Following the responses to form letter comments is a copy of an actual form letter and an alphabetical list of those who filled it out.

### Pre-printed Comments and Responses

1. This or any project should be completed and implemented as quickly as possible to provide timber in a timely manner to Southeast Alaska's dependent mills and suppliers.

Agree	352	Disagree	7
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*Response:* Comment noted.

2. I prefer Alternative 4 over the other alternatives based on the projected lower operating costs, because of the lesser amount of helicopter yarding and higher projected returns to the Forest Service and the State of Alaska.

Agree	344	Disagree	13
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*Response:* Comment noted.

To further improve returns and lower operating costs I suggest:

- a) Insure the preferred alternative exceeds 2 Million Board Feet/Mile of new road construction for the non-helicopter units.

Agree	344	Disagree	19
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*Response:* The framework for Alternative 4 emphasized timber sales economics, which included minimizing the use of helicopter yarding. The guideline of "2 million board feet per mile of new road construction" had to be significantly relaxed in order to approach the 125 million board feet target of Alternative 4. Because of the emphasis on cable yarding under Alternative 4 and the high rate of harvest in recent years in Polk Inlet, the next harvest entry into the Project Area, scheduled prior to year 2004, would need to be nearly two-thirds helicopter yarding, if Alternative 4 were implemented.

- b) Minimize helicopter yarding and time the helicopter sale for a period of rising markets to insure an opportunity for profit.

Agree	336	Disagree	26
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*Response:* Comment noted. Also, see response to 2a.



- c) Do not require roads to be built to a higher standard than necessary to safely remove the harvest volume.

Agree 334

Disagree 28

*Response:* Road standards are based on a combination of logging efficiency and other short- and long-term resource objectives. For example, if the road is open to the public, minimal safety features (lane width, turn outs) may need to be used. Additionally, mitigation measures such as erosion control and fish/stream protection increase road costs. However, without such protective measures, the road likely would not be allowed.

- d) Insure the overall EIS and each sub-area tributary to its own Log Transfer Facility meets minimum basic economics such as the "mid-market" test.

Agree 350

Disagree 9

*Response:* The mid-market test is intended to be a basic feasibility test based on previous long-term cost and price averages. It is used in the EIS to show which "sub areas" of alternatives may be at risk of being economically unfeasible. These areas are kept in the alternatives in case actual or future timber values are higher than the mid-market results. An example of this is the Little Coal Bay geographical area in Alternative 4. The mid-market test indicates this "sub area" would need an increase of approximately \$30 per MBF in selling value to be economically feasible. Dropping this "sub area" would reduce the available volume for Alternative 4 (and other alternatives) by approximately 10 million board feet. Recent timber sale appraisals and bid rates suggest the Little Coal Bay geographic area will be economically feasible.

3. Difficult and/or expensive harvest systems or harvest unit designs should be utilized only to the extent that they would not cause the EIS or a sub-area of the EIS to fail to meet the "mid-market" economic test.

*Response:* See response to 2d.

- a) Accurate costs should be developed to insure the economic analysis and comparisons are not flawed.

*Response:* Comment noted. This is in part why we use the mid-market test since it is based on past actual costs and values. However, see response to 2d.

- b) The flexibility to modify harvest systems for safety concerns must be allowed for.

*Response:* Harvest units will be designed to meet industry safety standards. Similarly, if unidentified safety hazards are encountered during implementation, appropriate action will be taken to meet established safety standards.

4. Wherever possible new Log Transfer Facilities should be low cost, low impact, low angle slides instead of A-frame or barge facilities which require expensive bulkheads.

Agree 347

Disagree 18

*Response:* Comment noted.

5. I support the continued use of Best Management Practices (BMP's) as the most effective way to protect other resources during construction and harvest. These BMP's can be updated as new information and practices are developed.

Agree

356

Disagree

8

*Response:* Comment noted.

### Summary of Additional Comments and Responses

1. Sufficient economic timber must be made available to sustain and grow the timber industry. This is crucial to the economic wellbeing of the area.

*Response:* Comment noted.

2. A weighted scale of responses should be used to develop the preferred alternative with greater weight given to local citizens than to those outside of Alaska.

*Response:* Comment noted.

3. Various suggestions were offered for how to lay out units and how to log them.

- a. Roads are being built too steep for truck safety. Should be less than 16 percent.

*Response:* See response to 2c.

- b. Many of the units can be enlarged or combined to make logging this area more feasible. This could minimize roadbuilding.

*Response:* Final harvest unit size is based on several factors: economics, logging feasibility, future entry considerations, limitations established by the National Forest Management Act, standards and guidelines established by the Forest Plan, the visual quality objectives, adjacency with past harvest, blowdown considerations, and other objectives. These factors were considered during the development of a logging system and transportation plan for the entire project as well as the integrated harvest prescriptions for each unit. Increasing unit size to improve economic returns will affect other resource issues and other future units in the area. See responses to R. Zeisak's letter regarding changes to proposed units.

- c. Could lay out units differently to reduce costs, e.g., avoid rocky knobs, bluffs, muskegs, and fish creeks.

*Response:* The potential harvest units were field verified in part to identify these features. The harvest unit design has tried to incorporate these types of features and often uses them to help meet other resource objectives by designing them out of the unit or designing logging-system-efficient (and safe) islands of no harvest within the units.

- d. Use low-angle slides and drive-down ramp LTF's.

*Response:* Comment noted.

e. Keep helicopter logging to a minimum; it is dangerous. Conventional logging creates more jobs.

*Response:* Helicopter yarding is considered a forest management tool. Even though it is more expensive, it allows harvest in areas that are not feasible to access by conventional logging methods or in areas that conventional methods would be too costly to meet multiple use objectives. The net result is that helicopter logging in these areas make timber available for harvest that normally would not be available.

f. Helicopter yarding is the least harmful to the environment and should be used more fully.

*Response:* Comment noted.



November 4, 1993

Mr. Dave Rittenhouse, Forest Supervisor  
U. S. Forest Service, Ketchikan Area  
Federal Building  
Ketchikan, Alaska 99901

Attn: Polk Inlet EIS

Dear Dave:

Below are my comments on several of the key issues in the Polk Inlet Draft Environmental Statement. These comments are both general and specific.

- Agree \_\_\_ Disagree \_\_\_ 1) This or any other EIS project should be completed and implemented as quickly as possible to provide timber in a timely manner to Southeast Alaska's dependant mills and suppliers.
- Agree \_\_\_ Disagree \_\_\_ 2) I prefer Alternative 4 over the other alternatives based on the projected lower operating costs, because of the lesser amount of helicopter yarding and the higher projected returns to the Forest Service and the State of Alaska. To further improve returns and lower operating costs I suggest:
- Agree \_\_\_ Disagree \_\_\_ a) Insure the preferred alternative exceeds 2 Million Board Feet/Mile of new road construction for the non-helicopter units.
- Agree \_\_\_ Disagree \_\_\_ b) Minimize helicopter yarding and time the helicopter sale for a period of rising markets to insure an opportunity for profit.
- Agree \_\_\_ Disagree \_\_\_ c) Do not require roads to be built to a higher standard than necessary to safely remove the harvest volume.
- Agree \_\_\_ Disagree \_\_\_ d) Insure the overall EIS and each sub area tributary to its own Log Transfer Facility meets minimum basic economics such as the "mid-market" test.
- Agree \_\_\_ Disagree \_\_\_ 3) Difficult and/or expensive harvest systems or harvest unit designs should be utilized only to the extent that they would not cause the EIS or a sub-area of the EIS to fail to meet the "mid-market" economic test.
- a) Accurate costs should be developed to insure the economic analysis and comparisons are not flawed.
- b) The flexibility to modify harvest systems for safety concerns must be allowed for.
- Agree \_\_\_ Disagree \_\_\_ 4) Wherever possible new Log Transfer Facilities should be low cost, low impact, low angle slides instead of A-frame or barge facilities which require expensive bulkheads.
- Agree \_\_\_ Disagree \_\_\_ 5) I support the continued use of Best Management Practices (BMP's) as the most effective way to protect other resources during construction and harvest. These BMP's can be updated as new information and practices are developed.

Additional Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

USFS Response Requested: None \_\_\_\_\_ Summary Only \_\_\_\_\_ Complete FEIS and ROD \_\_\_\_\_

## Individuals Who Responded to Logging Industry Form Letter

Ackerman, Bill Anchorage, AK	Barrett, Vera L. Klawock, AK	Blair, H.C. Ketchikan, AK	Casteel, Wendy Ketchikan, AK
Acton, Steven Ketchikan, AK	Barron, Linda Ketchikan, AK	Bliss, Ernest Wrangell, AK	Chaco, Benny Thorne Bay, AK
Allen, Dean W. Ketchikan, AK	Barron, Michael F. Ketchikan, AK	Blubaum, John E. Thorne Bay, AK	Chaco, Lynn Thorne Bay, AK
Anderson, Clifford Metlakatla, AK	Baskett, Antone Ketchikan, AK	Blubaum, Lynda M. Ketchikan, AK	Charles, Patrick R. Ketchikan, AK
Anderson, David Wrangell, AK	Beebe, Rocky D. Wrangell, AK	Booth, Robert H. Metlakatla, AK	Cherneski, Pete Anchorage, AK
Anderson, Rick F. Metlakatla, AK	Belcher, Roy LaConner, WA	Branda, Kathy Ketchikan, AK	Clark, James F. Juneau, AK
Andrew, Kay Ketchikan, AK	Bell, Carolyn Ketchikan, AK	Brazille, Nick Ketchikan, AK	Clark, Robert Hydaburg, AK
Antonsen, Beth Ketchikan, AK	Bell, Don Ketchikan, AK	Brink, Bruce Ketchikan, AK	Clevenger, Peter Metlakatla, AK
Armstrong, David Klawock, AK	Bell, Michael A. Petersburg, AK	Brooks, Arthur F. Craig, AK	Coleman, Leona Chehalis, WA
Armstrong, Leona Ketchikan, AK	Bell, Rob Ketchikan, AK	Brown, Brian & Nancy Sitka, AK	Collins, Wendell Birch Tree, MO
Armstrong, T.A. Ketchikan, AK	Benner, Clayton Ketchikan, AK	Brown, Elmore Veneta, OR	Cook, Earl Ketchikan, AK
Aschoff, Roy Ketchikan, AK	Bennett, Jill L. Ward Cove, AK	Buehrle, Curtis Cordova, AK	Miller, Lynn Ketchikan, AK
Atwood, Richard Ward Cove, AK	Bethel, Mitchell D. Ketchikan, AK	Buhler, Diane Juneau, AK	Cook, Margaret J. Ketchikan, AK
Atwood, Shellee Ward Cove, AK	Bethel, Patrick R. Ketchikan, AK	Burlington, Gregg E. Wrangell, AK	Correa, William C. Haines, AK
Auger, Judy E. Ketchikan, AK	Bevis, John Anchorage, AK	Buss, Wesley G. Coffman Cove, AK	Coss, Zachary Ward Cove, AK
Baggen, Anne D. Sitka, AK	Birch, Bruce Concord, NC	Carl, Joseph Craig, AK	Cowan, Georgia Ward Cove, AK
Baker, Michael W. Amboy, WA	Blackburn, Craig A. Hoonah, AK	Carr, Jerry Kodiak, AK	Cowan, Raymond Ketchikan, AK
Baldassin, James Ketchikan, AK	Blackburn, Terri Hoonah, AK	Casebere, Alvin E. Ketchikan, AK	Cowart, Leroy Kodiak, AK
Bandy, Garrett Ward Cove, AK	Blair, Charles Ketchikan, AK	Casteel, Marshall Ketchikan, AK	Cowart, Matt Kodiak, AK

Craig, Tom Ketchikan, AK	Emmorey, Clayton Wrangell, AK	Goicoedea, Penny L. Thorne Bay, AK	Hazelton, Robert L. Oakland, OR
Crumpton, Debbie L. Ketchikan, AK	Emmous, Glenn Ward Cove, AK	Goodman, Jeff Ketchikan, AK	Heath, Charlanne, J. Ward Cove, AK
Cutsforth, William G. Ketchikan, AK	Engle, Pete Wrangell, AK	Gotelli, Carleen Ketchikan, AK	Heffernan, Tom Bellevue, WA
Dale, Ralph J. Ketchikan, AK	Enright, Arnie P. Ward Cove, AK	Gray, Grace Ward Cove, AK	Hendricks, C.R. Ketchikan, AK
Davidson, Patricia Ketchikan, AK	Etherington, Betty & W.C. Coffman Cove, AK	Greenwald, Douglas Cordova, AK	Hendricks, Charles & Kay Ketchikan, AK
Davidson, William Ketchikan, AK	Faast, David Ketchikan, AK	Gregory, L. Klawock, AK	Hendrickson, Arnold Snohomish, WA
Davis, Ronald Ketchikan, AK	Finney, Don Ward Cove, AK	Groslong, Ralph C. Sitka, AK	Hendrickson, Wayne Ketchikan, AK
Davis, Wally Ketchikan, AK	Forsberg, Roger Ketchikan, AK	Grossardt, Vivian Wrangell, AK	Henry, Ronnie L. Metlakatla, AK
Day, W.A. Lewiston, ID	Fox, Dalton Ketchikan, AK	Guymon, M.W. Ward Cove, AK	Hiatt, Ted Hoonah, AK
Denton, Lloyd C. Anchorage, AK	Fox, Frances Ketchikan, AK	Hadaller, Michael D. Hoonah, AK	Hill, Bob L. Craig, AK
Derrick, Tracy Sitka, AK	Frauendiener, Kent D. Sitka, AK	Hager, Carole L. Ketchikan, AK	Hinchen, Michael D. Ketchikan, AK
Dix, W. E. Ketchikan, AK	Gabriel, John P. Ketchikan, AK	Hager, Gregory J. Ketchikan, AK	Hobson, Gordon Coos Bay, OR
Dougherty, William Juneau, AK	Gardner, Alan R. Anchorage, AK	Hager, Larry J. Ketchikan, AK	Hohorst, Timothy J. Ketchikan, AK
Doughty, Kenneth Aberdeen, WA	Gardner, John D. Ketchikan, AK	Halko, Michael Tacoma, WA	Hooker, Barbara Petersburg, AK
Drexler, Brooke Thorne Bay, AK	Schmitt, Tim Ward Cove, AK	Hamby, Paul Juneau, AK	Horahan, Jim Sitka, AK
Duketi, Jacqueline M. Ward Cove, AK	Garette, Carol Hoonah, AK	Hardy, Thomas C. Thorne Bay, AK	Hull, Margaret M. Coffman Cove, AK
Durette, Corey Ward Cove, AK	Garrett, Blain Thorne Bay, AK	Harrington, Raymond D. Springfield, OR	Israelson, David L. Petersburg, AK
Elliot, Robert B. Ward Cove, AK	Gavette, David Hoonah, AK	Harris, Arthur Lee Ward Cove, AK	Janino, Roy Ketchikan, AK
Elmes, Leo E. Coffman Cove, AK	Gerri Davis Ketchikan, AK	Harrison, Nancy Ketchikan, AK	Jeffers, Dale L. Elmira, OR
Ely, Pamela Hoonah, AK	Gibson, Rebecca Anchorage, AK	Hayes, Allyn Ward Cove, AK	Joensuu, P.I. Sitka, AK
Ely, William Hoonah, AK	Gilmartin, Vincent C. Jr. Ketchikan, AK	Hazelton, Jeremy Oakland, OR	Johnson, Carol Ketchikan, AK



Johnson, Clyde Ketchikan, AK	Kolkow, Teddy Ketchikan, AK	Malone, Ken Ketchikan, AK	Merriman, Susan K. Shelton, WA
Johnson, Jess A. Coffman Cove, AK	Korthals, Kurt Sitka, AK	Mann, Mike Brooklyn, OR	Meske, Sandra Ward Cove, AK
Johnson, L. G. Seward, AK	Lamb, Mary Ann Coffman Cove, AK	Mann, Milo Ketchikan, AK	Meyers, Mark Naukati Bay, AK
Johnson, Randy Ketchikan, AK	Lamb, Richard Coffman Cove, AK	Mann, Susan E. Ketchikan, AK	Miller, Brad Ketchikan, AK
Johnson, William R. Matlock, WA	Larsen, Larry Myrtle Point, OR	Martin, David Ward Cove, AK	Miller, Gary Wrangell, AK
Johnston, Michael F. Craig, AK	LaRue, L. S. Wrangell, AK	Martin, Joan Ward Cove, AK	Miller, Harvey Ketchikan, AK
Jurgeleit, William Haines, AK	Lauffenberg, Eugene Ward Cove, AK	Martin, Richard Seward, AK	Miller, Kathy Ketchikan, AK
Justus, Mrs Jim Sitka, AK	Lee, Billie Wrangell, AK	Martinez, Marguerite Metlakatla, AK	Miller, Rrena Ketchikan, AK
Kamm, Cliff Ketchikan, AK	Lee, Robert N. Wrangell, AK	Mays, J. R. Sitka, AK	Milner, Scott Ketchikan, AK
Keller, Katherine Cordova, AK	Lehman, Dale Ketchikan, AK	Mays, Vinita Sitka, AK	Murphy, Mike Klawock, AK
Kelly, Morgan A. Hollis, AK	Lemons, Larry Craig, AK	McCabe, Aaron, Ketchikan, AK	Muzzana, Patricia Ward Cove, AK 99928
Kelson, Kenneth Ketchikan, AK	Leslie, Jim Wrangell, AK	McCarroll, Richard Ketchikan, AK	Neiferl, Stewart E. Thorne Bay, AK
Kero, James J. Metlakatla, AK	Lively, Romaine E. Wrangell, AK	McCoy, James W. Wrangell, AK	Nelson, Gordon O. Ketchikan, AK
Kero, Karen L. Metlakatla, AK	Lloyd, Earl J. Onalaska, WA	McFarland, Hubert Ketchikan, AK	Nelson, Hyrum Ketchikan, AK
Kero, Nelo & Derinda Ketchikan, AK	Loitz, Dan B. Ketchikan, AK	McGraw, Chuck Sitka, AK	Netling, Kim Ketchikan, AK
Killian, Cyril Thorne Bay, AK	Long, Brayton E. Ketchikan, AK	McKay, Tina Cordova, AK	Newberg, Ed C. Kodia, AK
King, Robert L. Eugene, OR	Luhn, Mike Petersburg, AK	McNelly, Audrey Sitka, AK	Newkirk, Frank Ketchikan, AK
Klanowski, Jerry Coffman Cove, AK	Luhr, Jason Petersburg, AK	McNelly, William Sitka, AK	Newkirk, Sue Ketchikan, AK
Klein-Enright, Chere Ketchikan, AK	Lyness, Marvin D. Seward, AK	Mead, John M. Cordova, AK	Newport, Daniel M. Petersburg, AK
Knudsen, Timothy Gig Harbor, WA	Major, Phillip Metlakatla, AK	Medden, Judy Ward Cove, AK	Nichols, Harold P. Wrangell, AK
Kolkow, Joe D. Ketchikan, AK	Major, Valerie Metlakatla, AK	Meredith, Steve Ketchikan, AK	Nicholson, Kent Ward Cove, AK

Nielson, Dean Juneau, AK	Porter, Bonnie Wrangell, AK	Ruckel, Johnnie Kalama, WA	Skoog, Christopher Sitka, AK
O'Hara, Dennis James Juneau, AK	Potter, Leon Juneau, AK	Rule, Joseph S. Lynwood, WA	Smith, Darrell D. Wrangell, AK
Oetken, E.R. Sitka, AK	Prather, Sherry L. Ketchikan, AK	Sallup, Paul Ward Cove, AK	Smith, Donald P. Kodiak, AK
Olivadoti, Heidi Ketchikan, AK	Prentice, G. W. Craig, AK	Sanders, John Nikiski, AK	Smith, Mary Anne Kodiak, AK
Olvadoti, J. Troy Ketchikan, AK	Preston, Erin L. Ketchikan, AK	Sanders, Sue Nikiski, AK	Smith, Richard Yakutat, AK
Ostrom, Peggy A. Ketchikan, AK	Pugh, Woodie O. Ketchikan, AK	Sarff, Shawn Ketchikan, AK	Snyder, Dave C. Ketchikan, AK
Owens, Anne Hoonah, AK	Raber, Curt D. Bainbridge Island, WA	Schenek, Sandra L. Ketchikan, AK	Soderberg, Gary D. Coffman Cove, AK
Owens, Dave Hoonah, AK	Radergraham, Corrine Ketchikan, AK	Schmitt, Terry A. Ward Cove, AK	Soderberg, Jean Coffman Cove, AK
Owens, Dennis Ketchikan, AK	Raichl, Audrey Juneau, AK	Scott, Anita R. Juneau, WA	Sondenda, LeRoy Coffman Cove, AK
Painter, Michael J. Ketchikan, AK	Ray, Bill Juneau, AK	Sellards, Del Coffman Cove, AK	Soto, Edward Hydaburg, AK
Palmisano, John J. Ketchikan, AK	Reich, Michael Glide, OR	Sheffield, Erin Sitka, AK	Spence, Scott Ketchikan, AK
Parton, John H. Sitka, AK	Reinhart, Arnold Bend, OR	Sheffield, Larry Sitka, AK	Stafford, LaDonna Kodiak, AK
Paulsen, Bruce Ketchikan, AK	Reinhart, Troy Ketchikan, AK	Shewey, Donald V. Ketchikan, AK	Stafford, Lee W. Kodiak, AK
Pendell, Robert L. Wrangell, AK	Reno, James L. Ward Cove, AK	Shewey, Shirley Ketchikan, AK	Staska, Russ Ketchikan, AK
Peterson, Al Ward Cove, AK	Richards, Norman J. Sitka, AK	Shewey, William Ketchikan, AK	Stecklein, Joseph V. Coffman Cove, AK
Pieper, Paul Petersburg, AK	Riley, Ken Ketchikan, AK	Short, Lawrence Jr. Ketchikan, AK	Stecklein, Nanine Coffman Cove, AK
Pihl, Martin & A. Darlene Ketchikan, AK	Rivers, John W. Sitka, AK	Shoup, Judy Juneau, AK	Stodola, Duane A. Galvin, WA
Pimentel, Ruben N. Ketchikan, AK	Robbins, Kelly Kodiak, AK	Shrivier, Doug Ward Cove, AK	Stonelake, Robin Eugene, OR
Poats, Dewey E. Hoonah, AK	Robbins, Toni Kodiak, AK	Simbatton, Jeffrey D. Thorne Bay, AK	Stout, Charles Ward Cove, AK
Pool, Christian Sitka, AK	Romine, Linda L. Ward Cove, AK	Sims, Jack Thorne Bay, AK	Stuedwick, Robert Sweet Home, OR
Pool, Rolla W. Sitka, AK	Romino, Bruce A. Ward Cove, AK	Singer, William R. Ward Cove, AK	Swaim, Corky Ward Cove, AK

Taremi, Linda Ward Ketchikan, AK	Weyhmiller, David Ketchikan, AK
Tenney, Carl Ward Cove, AK	White, Richard Myrtle Point, OR
Thompson, John Cordova, AK	Williamson, Daniel Ketchikan, AK
Thornlow, Don Ketchikan, AK	Willis, Joe Coffman Cove, AK
Trout, Tammy Ketchikan, AK	Wolfe, Dennis Ward Cove, AK
Turner, Kiley J. Juneau, AK	Woodbury, George Sitka, AK
Valentine, Andy Ketchikan, AK	Woolley, Dan Wrangell, AK
Vantrease, Eric L. Juneau, AK	Worman, Arthur Ward Cove, AK
Visitacian, Colleen Ketchikan, AK	Young, Wendell Craig, AK
Visitacian, Rolanda Ketchikan, AK	Zwiers, Barry D. Harlem, MT
Wahl, James B. Kodiak, AK	
Walker, Rocky Sitka, AK	
Walter, Paul J. Ketchikan, AK	
Waltes, Susan Ketchikan, AK	
Warner, Earl Wrangell, AK	
Watkins, Fred Cathlamet, WA	
Watkins, Mary Cathlamet, WA	
Watson, Bonnie Juneau, AK	
Wentland, Mark Wrangell, AK	
Wetherbee, Frank Coffman Cove, AK	





# Appendix I

## Subsistence Hearings







# Appendix I

## Subsistence Hearing

### ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT Section 810 Subsistence Hearings Polk Inlet Draft EIS

ANILCA 810 hearings on the potential effects of the Polk Inlet Draft EIS alternatives on subsistence use in the Project Area were held in seven communities:

Craig  
Hydaburg  
Ketchikan  
Kasaan

Hollis  
Klawock  
Saxman

The advertisements for the subsistence hearings also announced open houses preceding the hearings to discuss nonsubsistence issues in the Draft EIS. Generally, few people attended the open houses. However, it immediately became apparent that some individuals attending the hearings wished to discuss other Draft EIS issues. Consequently, the hearings were divided into two segments. First, testimony was taken on subsistence issues. When the discussion of subsistence-related issues ended, the meetings were opened to general comments on the Draft EIS. In most instances, this division is clear in the testimony. In some cases, however, circumstances (such as the order in which people arrived at the meetings) invited a more informal approach. In these instances, Draft EIS comments may precede subsistence testimony, or the two may be intermixed. In all cases, the subsistence testimony is clearly distinguishable and was considered in preparing the Final EIS.

Considerable information was provided on subsistence generally. Responses to most of these comments are not provided because they were not specific to the Polk Inlet EIS; however, the information is valuable in putting the subsistence issue into better perspective for this EIS and for subsequent Forest Service NEPA actions that might affect subsistence use.

Responses to substantive project-specific comments on subsistence and on the Draft EIS are provided next to the comment. Comments and corresponding responses are given alpha-numeric designations with the T indicating testimony, followed by an abbreviation for each location and a number indicating the sequence in which the comment appeared. Thus, THOL-2 designates the second comment at the Hollis hearing for which a response is provided. Written responses are not provided when the issues were addressed orally during the hearing.

The testimony for each hearing location begins on the following pages:

Craig (CR) .....	3
Hollis (HOL) .....	4
Hydaburg (HYD) .....	25
Klawock (KLA) .....	49
Ketchikan (KET).....	52
Saxman (SAX) .....	59
Kasaan (KAS) .....	65

**ANILCA Section 810 Subsistence Hearings  
Polk Inlet Draft EIS  
CRAIG, ALASKA  
November 1, 1993**

**Responses to Comments**

**Larry Lunde:** Good evening. I want to do a round of introductions to get us started and then we'll turn it over to our hearing officer. First, I'm Larry Lunde from the Ketchikan Area office and I work in planning for the Forest Service. I'd like to introduce Dave Johnson, who's representing the Craig Ranger District this evening. Jack Lobdell, who is a cultural resource specialist and subsistence specialist for the Polk Inlet EIS. Randy Fairbanks, who is the project manager for Ebasco, and Judy Schneider, who will be the hearing officer this evening.

**Judy Schneider:** This is a public hearing for ANILCA Section 810 for subsistence for the Polk Inlet Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Ketchikan Area Independent Sales Program. As Larry said, my name is Judy Schneider and I've been designated the Hearing Officer for tonight's proceedings. Peter Carr will be recording any formal testimony and will also be taking your written comments if you have any that you'd like to offer us before the evening is over.

I would like to welcome you and express our appreciation to you for coming this evening and sharing with us your views on this study process.

For the record, today is Monday, November 1; the time is 7:14. This hearing is being held at the City Council Chambers in Craig, Alaska. The purpose of the hearing is to get your views on how the alternatives proposed for the project may affect your subsistence use of the Tongass National Forest. Other comments about the project will also be accepted. The hearing is scheduled to run from 7:00 to 9:00, but we'll go as long as it takes to make certain we have all the comments you would like to make about the project this evening.

We held an open house earlier today from 4:00 to 6:00, actually from 4:00 to 7:00, to provide information on the project and the various alternatives which you see laid out before you on the maps in front of you today. Some of you obviously attended that open house this afternoon. The purpose was to answer questions and to take comments on all of the issues pertaining to the Draft EIS. As I said earlier, however, if you have questions about the EIS or wish to provide additional information about issues other than subsistence issues, we will take those after we have received formal subsistence testimony. We may, in fact, intersperse them depending on how attendance goes this evening.

There are also some forms on the back table that you can either fill out here or take with you and send back to the Forest Service office. We encourage you to provide written comments if you choose not to testify or present informal comments this evening. All of these comments will be considered in writing the final EIS.

If you have not already done so, and I think all of you have, sign the sign-in sheet, printing your name clearly. If you are giving testimony, please state your name, spell your name, give us your address so we have a check to make certain we have the right person when we formally transcribe these statements.

Thank you, again, for attending this hearing. Is there anyone who wishes to give formal subsistence testimony? (No response.) Is there anyone who would like to make a statement about the draft EIS issues other than subsistence issues?

**Speaker:** Yeah, I'll make a statement.

**TCR-1**

**Tom Twitchell:** My name is Tom Twitchell (spelled). I live in Thorne Bay; my address is P.O. Box 423. I have looked over the Polk Inlet EIS and I prefer Alternative 4 of the alternatives that have been offered. It appears to

**TCR-1** See Responses TT-2 to TT-11 in Appendix H.



me that it gives the most return to the American people for the timber that we are harvesting off the area. However, I'd like to add that Alternative 4 could be made better if we would pay some attention to road costs, the way we go about putting in log dump facilities, and some of the timber mixes. There are some units in some of the other alternatives that would help Alternative 4 in a substantial way and help come out with the volumes. That is basically what I have to say.

**Ms. Schneider:** Thank you. Anyone else? (No response.) Well, I guess we'll pause for a while.

### End of Hearing

#### ANILCA Section 810 Subsistence Hearings Polk Inlet Draft EIS HOLLIS, ALASKA November 2, 1993

**Larry Lunde:** Most of us have met each other; you folks don't know each other obviously. You've met us; we've met you. What I'd like to do is just kick this off with some introductions and first of all thank you for coming to the Polk Inlet EIS subsistence hearings. I'd like to introduce Dave Johnson, who's representing the Craig Ranger District, and I'm from the Ketchikan office of the Forest Service. My name is Larry Lunde. On the Polk Inlet EIS, what we've done different than what we've done with most of our previous EIS's, we've contracted this one and we've contracted with Ebasco Environmental. So, I'd like to introduce Randy Fairbanks, who is the project manager for Ebasco. I'd like to introduce Jack Lobdell, who was one of the subcontractors to Ebasco, and Jack did the—was in charge of the cultural resources and was in charge of the subsistence baseline study. I believe some of you folks may have been interviewed for that. That study was designed to validate the TRUCS information that was done back in '86 or '87 in relation to the Polk Inlet Project Area. I'd like to introduce Peter Carr. Peter is a public involvement specialist for Ebasco and as we can see he's taking care of the recording tonight. And, I'd like to introduce Judy Schneider. Judy's been responsible for the public involvement as well as the document production for the Polk Inlet EIS. She's with Ebasco and she's also our hearing officer. So, with that, I'll turn it over to Judy.

**Judy Schneider:** I have some formalities to get on the record. This is a public hearing for ANILCA Section 810 subsistence issues for the Polk Inlet Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Ketchikan Area Independent Sales Program.

We would like to welcome you, again, and express our appreciation for taking the time, in the midst of what we know has been a fairly unusual period in your lives, to come and share your views with us on the EIS—on subsistence issues and other things.

For the record, today is Tuesday, November 2 and the time is 4:10. This hearing is being held at the Hollis Public Library, and the purpose is to get your views on how the alternatives that have been laid out here for you this afternoon may affect your subsistence use of the Tongass National Forest. We will go through the subsistence testimony—if any of you have formal statements you would like to make on subsistence-related issues, we will take that first. After that formal period is over, we will then take comments on anything you want to talk about, including the Polk Inlet EIS. We know you have some other things on your mind. The hearing itself is scheduled to run from 4:00 to 6:00, but we will stay here until we're sure that you have had an opportunity to express any and all views you would care to pass on to those of us who are here to listen to you. That was, in part, the reason for the open house that we held this afternoon. I know some of you would like to make certain your views are part of a paper trail—a written record—and that's why we're recording tonight's comments.

There are also some forms at the table as you came in that can be used to send written comments into the Forest Service if something occurs to you after the fact. They're kind of self-mailers so, if you think you might have more to say

than you've said this evening, please feel free to take some of those forms with you and send them back. We do have to have your comments, however, on both the Draft EIS and subsistence issues related to the Polk Inlet EIS postmarked no later than November 24th.

If you have not already done so, please sign-in as you are leaving, so that we have a record of those of you who attended and get you on the mailing list, if you aren't already on the mailing list. If you don't want to be on the mailing list, please so indicate. Generally, that's pretty much it. If anyone is here who would like to give testimony on ANILCA Section 810, subsistence issues. (Interruption) Who would like to go first?

**Stan Marzden:** Excuse me, a lot of us here get our mail from Craig, and I wonder if that will make a difference, that we live here and get our mail from Craig?

**Ms. Schneider:** Not at all. No. We would send anything to your mailing address. If that's what you put on the sign-in sheet, that's how you would be recorded on our database. Who'd like to go first? Any subsistence testimony? (No response). (Pause). Okay. Well, we can always come back, if someone comes a little later who would like to give formal testimony. For now, we'll move on.

Questions, comments that you would like to pass on or share with the Forest Service on either the Polk EIS or other issues that you'd like to talk about?

Yes, sir. Would you state your name first, and spell it for us as well, so that we have it—

**Mike Rieves:** My name is Mike Rieves (spelled). I have, in essence, a two-part presentation, so part A is directed at Hollis and subsistence, and so that is probably what you're interested in, since this is an 810 event. Right?

**Ms. Schneider:** Right.

**Mr. Rieves:** Now, I don't know for sure—as you were mentioning—paper trails have ways of not connecting. In '91, when the supplementary environmental product was—had hearings on that—here in Hollis, too, I submitted, in writing as well as testimony, to that. And I sent to Brink's office, one copy, and then, last summer, to Rittenhouse, to make sure everybody was aware. Now, most things are being done by reference to that, so, I don't know. Are you familiar with it? Did Griffiths get a copy of this Hollis biobuffer that I generated as a response to the SDIS '91?

**Dave Johnson:** I don't know that he did or not, Mike. My perception is that if you in fact sent it to Brink and to Dave Rittenhouse, that, if Greg did not get a copy, he was aware that you had submitted it, so I'm reasonably confident that he probably was aware that you had sent it in and may even have a copy. Now, I don't know that for a fact, but—

**Mr. Rieves:** Okay.

**Mr. Johnson:** Paper tends to track between Juneau, Ketchikan, and the Districts pretty well.

**Mr. Rieves:** Okay. Alright. Well, as I noted in this Polk Inlet Project, there is a propagation of errors, and they're fairly easy to track because, in essence, some of the same ones I pointed out for the TLMP Revision. Okay? The essence of this submission was to generate a buffer around Hollis, and an enclosure here is a map with appropriate sketched in, color coded, around the Hollis area. The explanations for it are in the text. Pertinent information, which ought to be said on top, is that the amount of land that was suggested for this buffer comprised .3 of 1 percent of what the Service refers to as their most actually available and suitable timber lands. Prior to this, there was an appeal here on the Record of Decision which included logging in the Indian Creek watershed. That particular appeal was handled extremely poorly by the Forest Service, and I have track in this report about that circumstance, also, and I have retained the documentation. The final response was from the now acting chief, David Unger, who was reviewing officer at that time.



THOL-1

One of the problems that's easy to point a finger to begins back in the subsistence section in the bar charts that are presented. Now, it was done differently in these two productions. The data was massaged differently for the Polk Inlet Project as compared to the previous presentation. But, the problem still persists. Namely, and the plan even admits, that they used habitat capability models. And these are assumptions to a number of conditions. So, what is done on paper here has a tendency to a lot of people to become in fact what's on the ground. So, it's important, cause I notice you're still producing these charts in the same fashion with the same type of descriptive language, and that has a tendency to propagate the concept that a capability model is reality, and people start looking at actual numbers in there for deer, for example, which is, oh, sort of a favorite topic, I guess, in the Southeast. And, one thing which is really obvious and, of course, you relate—you give credit source to ADF&G Harvest Reports and '91 EIS here, TLMP Revision—Hollis was recorded as to having two deer harvested in this WAA 1317, which is the essence of K17 Management Area. Well, it should be sort of obvious that is probably not correct, and I just made a reasonable survey of a cross section of folks and I came up with at least 27 legal deer for that same period, which was '89, and that's the period that report was done for. So, when you adjust the chart to that and, of course, there is, I believe, some sort of general tendency for under-reporting the farther away from the major cities that you get, is my understanding from ADF&G. So, even total subsistence could be a misleading number and is a shortfall. And, then when you add the nonsubsistence people and get a total, the numbers are already very close, and that was for 1990. And so, when you get plus or minus one or two deer, that should be a flag that something is amiss. In other words, you might have to invoke some sort of a stricture in allowing subsistence only, for example, rather than the people not living in the immediate area.

They did the same thing again, as I mentioned, in this book. Except, this time, the number came up to be an average of nine. And so, when you readjust all these things, you still got a problem that shows up. Now, I would guess, of course TRUCS was the first face-to-face survey, and then, as I understand it, I wasn't here last summer, but I understand that, what Ebasco representatives came around and queried people again, and that apparently didn't reflect those type—apparently those kind of questions were actually not asked. Did you get them to in WAA 1317. Of course, I don't—a lot of people don't even know what you are talking about, so that's probably difficult. The main point is that they are in error. They're in error in methodology as well as numerically, and so the Forest Service might want to be looking at that particular—now that's the 1317 I am referring to, I'm not talking about any other area.

**Unidentified Speaker:** Would it be possible to have one of the rangers point out on the map the area that Mr. Rieves is talking about?

**Unidentified Speaker:** Do you have a game area map here?

**Randy Fairbanks:** Let's see. There's a small map of the WAA'S in the EIS. Let me look at it here, and then we can point it out up here.

**Mr. Rieves:** Here, I've got one in here. Let me just give it to you.

**Mr. Fairbanks:** Okay.

**Mr. Johnson:** That would be—we are talking this area—the Twelvemile Arm—around here and stretching over across the Island this way. So, something along this area here. Is that right?

**Mr. Rieves:** Well, I don't know, that is facing away from me.

**Mr. Fairbanks:** Yeah, it comes down—it takes into account these—it follows the VCU boundaries here, and then comes down like so, and then out this way, so it's all of this area: the Harris River, the Maybeso Watershed, Indian River, and all along the Twelvemile Arm.

THOL-2

**Mr. Rieves:** Okay. In the Polk Inlet Project, page 3-160, we're in the subsistence section, and down here you're referring to the Hollis area, specifically. There's another indicator of how numbers can come out quite wrong. It points out that Hollis residents obtained one subsistence and personal-use fishing permit for the Project Area rivers and streams and used it in Maybeso

**THOL-1** See Response to MR-8 in Appendix H.

**THOL-2** See Response to MR-5 in Appendix H.



**THOL-2  
(cont.)**

Creek. They harvested an annual of 57 sockeye and 2 pink salmon in '85 through '91. Well, we had two permits ourselves, and our neighbor had one, and so I would say you're off by at least a factor of 100 in terms of the Maybeso pink. And then, of course, you superimpose on that the number of people who don't necessarily like to report or get permits for subsistence and so on. There are a good number of people who use the creek. That's not going to track too well. But, I don't know what happened. I know that during that same period we returned our two to Phil Dougherty over in Ketchikan and the neighbor did too, so something fell through the cracks in that regard, so that is a misindicator of subsistence usage, also.

**THOL-3**

There is a methodology error in your giving proportional factors on the WAA'S as they lie inside the Project Area in terms of their deer usage and capabilities, and that proportionality is not correct because the areas, the habitat areas for deer, are completely different from part to part. And so when you have a generic proportionality factor, there, just a ratio of area inside the project boundaries, you're not going to get a—the fidelity is way off. So that is a methodological error there.

**Mr. Fairbanks:** I might point out that the ratio that was used was not a ratio of area. It was based on habitat capability in areas outside the Project Area based on the model. What the model predicts is habitat capability outside the Project Area throughout the entire WAA, and then the habitat capability inside the Project Area, and then that ratio is used. Not—which should take into account at least some of the habitat differences.

**Mr. Rieves:** Well, that was my first suspicion. I would assume it would have been done correctly that way, but you also have a table in here that gives the proportion of WAA'S in the Project Area. I ratioed all of those examples out and everyone of them were just straight area products. So, you might want to review that.

**Mr. Fairbanks:** OK, we'll look at it.

**Mr. Rieves:** So it is pretty easy for the conclusions about subsistence using being way off as they are stated in here. Now from this point there is sort of a interface with subsistence you might call it. In my response to the TLMP Revision '91 in some of the reasoning for the buffer area around Hollis proper that it was put in there. For example, right behind us here in VCU 611 that interfaces with Karta Wilderness and as you go down Twelvemile Arm here there are a few old clearcut areas but there is predominantly old-growth characteristically good high-quality deer winter habitat in that area, beach fringe to subalpine and alpine. When you get up on the alpine up here, unless you get a real good snowstorm, the usual story, for a number of reasons that is their hangout, but not only, I noticed that the language is deferral in this plan for VCU 611, and it is also still listed as a scenic viewshed and up on top is modified landscape and then over in other parts of the publication, the blue one, there is conversation about Karta and its fragmentation relationship with respect to fairly extensive logging activities all around it, and of course it is fairly easy to go ahead and make the designations that were available in the TLMP Revision like old growth or primitive recreation or something. You are not making a park out of the place, but you are creating a larger bioregion and there are all sorts of good in addition to all sorts of amenities for people who live in Hollis. There are some sentient people who live here that appreciate aspects and of course as you look across, people move around.

**THOL-4**

There is some mention in here that the boundaries of Hollis are not well defined and so I mean that people have no trouble. They freely migrate from point to point and they view the area all around and in some of these alternatives they're right in the middle of it—and VCU 611 goes across the water over there and has a little. But Alternatives 2, 3, and 4 are doing a whole bunch of bad things at the same time as subsistence. Number one is there—are going right into the buffer—they are going into the Indian Creek general area. You have a map over here on page 3-161 which gives some indication of like greater than 10 percent of Hollis residents hunted in these areas. Well there is a great big shaded bed right up there in the upper reaches of Indian Creek and you superimpose on that the possible cutting units. Well that—there is something, there's a fly in the ointment there—those two things don't get along quite well.

**THOL-3** See Response to MR-3 in Appendix H.

**THOL-4** See Responses MR-7 and MR-10 in Appendix H.

You also point out in here that among a number of other things, a few other things, you are using these habitat capability models in your evaluation of the effects of the different programs on subsistence. Now, once, again, you are going from sort of a fuzzy condition to something that might become concrete in terms of its effects because subsistence is what subsistence depends on, not capability models, admitting that you got to go somewhere to try to get some sort of census of what is out there, but those are the kinds of things that could lead to difficulties for people that in various ways and percentages of their efforts enjoy or require subsistence or quasi-subsistence conditions around here. Now I also noted and I don't know what happened there, you even got a road showed on two, or three, or maybe four, you have a road that goes in to state land. Those cutting units now it doesn't surprise me at all considering the time of people that are up in Juneau, Andy Pekovich and the governor and all of their appointees, as a matter of fact right now there is a Tanana Valley State Forest Plan that was Glenn Old's brainchild and you are going all the way from Tok to Kantishna and the potential of that is wiping out boreal forests right and left all along the highways so I guess that is just a side comment but I am not surprised that the road would be allowed. I assume that a permit of some sort has already been negotiated with DNR. Are you familiar with it?

**Mr. Johnson:** I am not familiar with the road negotiation with the State, but I know what you're talking about here in the Indian Creek drainage. They may want to comment on this later, but the current 89-94 Environmental Impact Statement for the long-term sale area provides for harvest in that drainage now.

**Mr. Rieves:** I know that was, as I mentioned earlier, about the appeal to Indian Creek.

**Mr. Johnson:** Right, and so I can only assume that either we have an easement with the State or that is being worked out, otherwise I don't know how we would be able to lay out those units to provide access.

**Mr. Rieves:** That road and its associating units were not visible on any of the prospective maps in the prior presentation, so that information was not available to me to even comment on. There were about four units of concern, two were deferred and two were given the go-ahead by Barton and now there is more than someone with fuzzy eyesight can count in the distance in there. So that is a strong interaction problem as I see it going on up there.

**Mr. Johnson:** So are referencing the 89-94 in terms of the display of units that were identified in the Record of Decision for the 89-94 Indian Creek Drainage? Are you indicating that those are different now than what was?—(noise)

**THOL-5 Mr. Rieves:** Much additional, much additional. And also you've got—how things might impact subsistence in the long-term is one of the real difficulties and contentious points even among professionals, but you have a whole handful of helicopter type sites up in there. Well there is absolutely no decent database on the stresses induced on the wildlife with those completely obnoxious skycranes up there. They saturate the area. There is some mention about it if you find marbled murrelet and you want to go around and do this and that, I don't have any faith—how far can you go around and still get the job done? You know, they are fairly, they just saturate a region, so I—In terms of what might happen, in terms of subsistence, I don't want to see any prospect of helicopter logging anywhere close around here. And of course that is in that same area again. And then you have some on the other side of Twelvemile Arm too and just over the hill, right over here towards Old Franks, there is potential. Same statement. And of course it may be a little bit off here from subsistence, but I don't personally want to live here and have to listen. Once you start that type of regimen, it is going to go on for a while. That's, because those units—that would be just the beginning, what you have on there, and short-term effects on wildlife, who knows what the stresses might be, if much of anything, but there are, well it depends on what happens to the world, there might be some people here in the next century that have evolved a little bit better and they might want to be left with the possibilities that are still available here. So that is fairly long-term view on that too. Now the rest of the things I have will speak to the plan in other parts, so you might want go on and do something else.

**THOL-5** See Response MR-17 in Appendix H.



**Ms. Schneider:** Do you to submit any of the written materials you have there for the record, Mr. Rieves?

**Mr. Rieves:** Well it is not in that type of form, I will just have to send it over, the address is given.

**Ms. Schneider:** Thank you. Anyone else have subsistence comments? Or any other comments that might be relevant.

**Stan Marzden:** My name is Stan Marzden, and I live in Hollis. After this summer everybody, there was a long dry spell we had and it goes to prove how much buffers we need on the streams. A lot of the streams we come across this summer were almost lukewarm and if you had a real good buffer, I don't know how much you have had, but this summer it wasn't enough. A lot of the fish just died at the mouth of the river, because the streams are too warm. I hope they take that into consideration when they log. What happened this summer all the fish that died and we won't know until the next 3 or 4 years what damage has been done because some of the, even on the smaller streams that are way up that is where the warm water starts, way up the mountain it's all clear and no trees on the edges of the streams to keep it cool, and by the time it gets down to the bottom it is warm. I hope they keep that in consideration. Especially this year; it could happen again next year and next year and the next year.

**Mr. Rieves:** Could I make a corollary statement to Mr. Marzden?

**Ms. Schneider:** Absolutely

THOL-6

**Mr. Rieves:** There is one thing I failed, I forgot, exactly what he was talking about, I noted somewhere, I don't know where it was, that, of course, the Reform Act mandated buffers of various types of class streams and the 100-foot is the minimum. It is being taken as the maximum in many regards and not only that the measurement is not the same survey as you are surveying for your trees, horizontal projection there slope, and that is not appropriate. You have a lot of streams where the geography turns out possibly easily 45 degrees, not percent, 45 degrees, so you wind up not a hundred feet but maybe only 70 feet horizontally from the streams in these buffers. That is sort of not very ethical. You are pushing an interpretation to the advantage of timber production at the expense of the intent of trying to protect these streams. So you should be at least taking horizontal projective measure for these buffers. OK?

THOL-6

The Forest Service is now measuring the minimum 100-foot TTRA buffer on horizontal distance.

**Ms. Schneider:** Anyone else?

THOL-7

**Cindy Rieves:** I don't have anything on subsistence. My name is Cindy Rieves and I am not at this time prepared to deal with the specifics I am looking at the issue as a whole and the comments that I would like to make are based on that. Clearly the benchmark in which to measure the effects of harvesting timber from the Polk Inlet Project Area are best achieved by incorporating those impacts previously generated island-wide rather than concentrating environmental consequences to just one segment of it. The four proposed action alternatives under consideration failed to address the cumulative aspects that road-building, logging, and their associated activities have from the outset or continue to have on the island as a whole. Nor do they take into account those same types of activities that are occurring on adjacent forest lands not part of the Tongass but on Native Corporation lands.

THOL-7

See Response CR-1 in Appendix H.

And then you have, if you look at it in an even wider sense, you have the global implications of continued alteration of natural landscapes to satisfy the demands of one species, that being *Homo sapiens*. The integrity, stability, and biological capability of the land has been vastly diminished as resource output targets determine management policy and practices on the Tongass, and Prince of Wales represents how best not to manage a temperate rain forest. Our national forests are more than mere warehouses of goods maintained for our usage and consumption. They are biotic communities that have co-evolved over the millennia encompassing a vast array of species other than our own. These species do not exist in a vacuum but have inter-specific dependencies on one other and the biosphere which supports them. The complexities of



such systems are only now in the stages of being identified as their significance is finally being recognized and acknowledged. There is a lot of data that is being collected now that we won't, that is going to be in the process for years before we will know what effects they are going to have on what we do.

A comprehensive understanding of the integral nature of the forest biota is necessary to ensure its success into the future, not just for today, not just for the next 10 years or next 100 years if you are looking at supposedly rotation of the forests being able to come back in 100 years time and cut it again. I think what we are going to end up with there is a mono-culture; we will have lost our diversity, we will have lost the understory, we will have lost all of small species that are dependent on it, from the brown creeper to the marbled murrelet to the goshawk to the any number of other species that depend on that forest for their existence. Piecemeal approaches only serve to undermine the success of the forest and have already been a causative agent for threatening the viability of numerous species populations on the island as their habitat has been fragmented and destroyed. We start taking the forest and we start taking a chunk out here and we start taking a chunk out there and we talk about leaving corridors for access for the migrations of these species. Well we have roads that are intercepting those, we have people who are going into those areas and causing further disturbance of wildlife. You have to look at the island as a whole and that is not being done. We are looking at a piece here, for instance, the Polk Inlet Project Area.

That is just a piece and the impacts that have been talked about are just in this area but it is not looking at the combined impacts all around the island and what is going to happen, and I'm getting off of what I have to say here, but there is a certain mentality that exists that is really disturbing, and for those who persist in believing that the island's environment will continue to accept further degradation without any catastrophic consequences, they are fooling themselves. It is this type of mentality combined with arrogance and ignorance that impedes appropriate behavior and action on behalf of the biosphere and which I feel a stymied responsible stewardship of these lands. The mentality of "get out to cut"—you hear it all the time. I was talking with someone earlier here about how we have been through this process to set aside Indian Creek to defer it from any cuts. We made an appeal, a buffer zone for Hollis. It is like every time we keep coming back and we hit return and start all over again, everything that has been said has just been either forgotten or not even paid attention to. And of course, as one might surmise from my statements, I am adamantly opposed to the proposed logging and roading activities slated for this area currently or otherwise down the line and will continue to support a No-Action, a No-Harvest Alternative as I have in previous correspondence and testimony.

**Ms. Schneider:** Thank you, Ms. Rieves. Anyone else? We are also prepared to answer any questions you may have that may have arisen since you talked with members of the project team earlier this evening. Just giving statements or any questions can be raised at this time as well.

**Johnny Laird:** I am Johnny Laird and in reference to Mike's earlier statement about Hollis and I too read in the blue book where it is stated that the boundaries of Hollis weren't closely defined, but the boundaries of Hollis are closely defined, the Hollis Community Council organized and we set aside the actual boundaries of the Hollis community at that time, so we do have actual boundaries in our file and our articles of incorporation and our bylaws. It is filed with the Hollis Community Council, which is a nonprofit corporation.

**Ms. Schneider:** We could get a copy of that.

**Mr. Laird:** That's in physical description—in terms of township and range.

**Ms. Schneider:** Thank you. Mr. Rieves, do you have any more comments to make that you want?

**Mr. Rieves:** Oh sure, but I've captured a certain capsule of time. There may be somebody else who might want to interject a few simple thoughts,

**Mr. Laird:** And I too was interested, noticed that the road was going to go through some State property on that back end on the other side of Indian Creek.

**Mr. Lunde:** I don't believe, in fact I am almost positive that we haven't even requested a permit, or a right-of-way, or an easement for that. Because when in the 89-94 stuff in Indian Creek we're accessing it from above, I believe.

**Mr. Laird:** All your alternatives are—Alternatives 2, 3, and 4 all have the same, and that is this road, right?

**Mr. Lunde:** The key there is, Johnny, that it is a proposed road, and at this stage, all we would do is if one of those alternatives were selected or an alternative was selected that would require that road, it would be contingent upon getting an easement or right-of-way. So that is all the stage it is at—for this proposal.

**Mr. Laird:** Then how will those units be accessed that are in the 89-94 that are currently being—

**Mr. Lunde:** I believe that the Hydaburg Road is part of that One Duck system.

**Unidentified Speaker:** Not on the state boundary, no, but in terms of accessing the Indian Creek drainage is my question, not the—

**Unidentified Speaker:** It doesn't cross the state line; it doesn't cross until these current alternatives. I believe they come off the One Duck Road.

**Unidentified Speaker:** So that road will be extended, the One Duck Road will be extended—it's not shown on the map.

**Mr. Lunde:** There's an option, if you look at the long-term transportation plan, that would have a road that you could loop this whole way around. So the alternatives that include that show different scenarios.

**Unidentified Speaker:** I've got a question with—what Cindy said, she said she brought this up before and it hadn't been taken into consideration, everything that she said. How do we know it's going to be taken into consideration now? Is this all done for nothing or just talk or—?

**Mr. Lunde:** That's a good question, and it's a good point that she has made. The types of points that Cindy made are primarily Forest Plan-level decision opportunities, the land allocation and those kind of things, and what we'll do is take this and once again pass that up, and I understand the frustration level, because you keep bringing stuff forward and we look at it. At the Forest Plan level we determine what zone different pieces of land are going to be managed for. In the current Forest Plan as well as the revision, some of these lands including Indian Creek are proposed or are to be managed for timber harvest as well as other resource things that are going on there. So I can understand how you would feel maybe you haven't been listened to. But that upper level process has gone on and hopefully did listen to it and some decisions have been made from that. From the project standpoint, where we're coming from with Polk Inlet or one of our other projects, what we're trying to do is take those upper level decisions, or land allocations, and come in and propose different alternatives to implement that direction. And then, what I hope what we've been able to do with these EIS's is to show the effect of doing that, and if you look at the different alternatives and you start looking at cumulative effects analysis that we've got in this in this EIS, we should be able to see what the consequences of implementing that Forest Plan would be.

For example, if we went into a new area that previously was unharvested or undeveloped, we should show what the consequences are on habitat, fragmentation things that you mentioned, and show what the consequences are so that management, whoever's making that decision, in this case the Forest Supervisor can make an informed decision and recognize the consequences, as well as be able to listen to inputs from your testimony here, and other written comments. Then hopefully they'll make the most informed decision. Now those decisions could mean to go ahead with that, it could mean maybe defer it in that area at this point in time and taking something else in the Project Area, and keeping that option open. Or it may be not going into that area and passing that up to the Forest Plan and say, "hey we need to take another look at this."



So at the project level that's what we're trying to do and hopefully in our analysis and what we put in the EIS will clearly display those effects and when you folks look through that, and especially if you have interest areas, I would ask that you would go look at that and see if we've moved in the right direction of doing that so that the most informed decision can be made.

THOL-9

**Mr. Laird:** Also, you know, its a thing in reading the EIS, I was concerned with a point that Cindy brought up which is a good point you know that the Polk Inlet EIS being isolated on the map is fine but that the Native lands have entered into the picture now, in the recent history of forest harvest and species habitat and even within the Polk Inlet EIS, even within the Polk Inlet boundaries, the Project Area, there's mass clearcutting going on or has gone on in Native areas, in the Cabin Creek area of Polk Inlet or Frank's Lake, and then just outside the boundaries—over with the Kavalco property, and these are mass-logged clearcuts which leave zero habitat for the species that we're all concerned with—fish and deer and bear. So she brings up a good point, that it should be those Native cuts on the private lands should be taken into consideration.

THOL-9 See Response JB-2 in Appendix H.

**Ms. Rieves:** One of the things in the abstract was that when the Forest Service has a certain amount of timber that is requested to be put out on the table to harvest, and it hit me in here right off the bat was that, you're going to make to make 125 million board feet available from the Polk Inlet Project; you're either going to make it available to the KPC or to other independent timber companies. That really bothered me, that "or." I mean, I know about the contracts with KPC, I know about the legalities that you got involved with the 50-year contracts with that, but if they're not interested in it, then why offer it to independents? Why not say, "okay, take it off the table." Don't defer it, because all that means is, like you say, it's an option for putting it back up on the table at a later date. Just say, "okay, we're setting it aside." Permanently. No cut, no harvest, no roads in there.

**Mr. Lunde:** I'll respond to your question. The major portion of our EIS's—the North Revilla EIS which is close to, the final is out on the street now, the Central Prince of Wales that we're working on, the Lab Bay EIS which is the northern part of the island, and then Polk Inlet—in the long-term contract we have with KPC we have what's called the primary sale area and then we have the rest of the contract area which is, when you put the two together it encompasses all of the Ketchikan area, and then the primary sale area is the area where we pretty much went just to those areas and offered just to KPC. But when looking at the total picture, and to be able to spread those effects out that we've been discussing in that concentrated area, we need to be looking at the whole area. And we also have an independent timber sale program and those folks want their piece of the timber volume that's available as well, because of the small mills, other folks, our obligations to the small business aspects of things and so forth. So, generally we're not able to offer timber for sale in the primary sale area so what we're doing is looking at areas that are outside that primary sale area. The Polk Inlet Management Area K-17, which is primarily this area (points at map), is in the primary sale area of the contract and then this area (points) is not, and so what we said was that this area, we can provide timber throughout here for KPC, but we also have an area or zone here that we could offer some for the independent timber sale program, so that's what that meant, it wasn't like an either/or type of thing.

**Ms. Rieves:** I think what it boils down to too is the matter of scale, and I don't have a problem with the small logging operations, someone that wants to go in, maybe a two or three man type operation where they're milling their own lumber, not just carting it off to be sent overseas somewhere. That, I think that's a direction that the Forest Service management needs to take, looking at it down the line, what kind of operation are they allowing on the public's forest and small scale, which is what we had prior to the big corporations in the 50's, the gypo loggers were ran out, and if the gypo loggers had been allowed to continue we wouldn't have this problem that we have on the island of losing habitat and losing species. Thirty years down the line, I question that there's going to be anything left on the island as far as forest goes. I think it's going to be gone. And I think the qualities that I like to look at are going to be gone.

Our house used to have a view across Twelvemile Arm, over to the Native corporation land. Well, we let the trees grow up in front of the big picture windows, because they clearcut it down the shoreline virtually, and we hear



helicopter traffic going back and forth. When you live on the water, sound travels. People can hear other people. In a small community such as this, you can hear what your neighbor's saying almost, down the road. It's amazing how sound travels. I can hear conversations from Danny Sharp's kids and they're two lots below ours! It travels and we're uphill and we hear a lot of it.

THOL-10

Another issue besides that is the helicopter trafficking of logs. I worked at the school for three years as an aide, and it was really disruptive to have a helicopter come anywhere close by because the kids immediately were drawn to the volume of the air disturbance. So, it's like, okay we'll wait till the helicopter leaves, everyone go to the window and look, it's a helicopter, yeah, we'll get back to our studies in a moment. Well, if you're going to have something that's going to be going all day, which, you know, they're not going to say, okay guys we got a half an hour to log, let's get this done; you're going to have that noise just going continuously. They shouldn't have to be exposed to it. I do not want to be exposed to it. I don't want to have to listen to that.  
(Silence)

**Mr. Johnson:** Cindy, could I make a comment on the comment you made regarding the Forest Plan Revision, and also in reference to Mike's comments, a testimony/comments that were taken from the Hollis area. I wasn't present when that information was gleaned from the folks in Hollis, but I can assure you that the information was shared and used and was part of the decision-making process. In the context that the Tongass Land Management Plan is still currently in a draft form—there is not a finalized plan, it has not been approved, it has not been implemented—so on the one hand I can understand and perhaps appreciate your frustration at sharing information at that time that you felt has not been acted upon, if you will, but at the same time that was a different type of planning effort that still is not completed, by the way. And now, this is another planning effort that requires that same kind of information.

**Mr. Marzden:** I'd like to make a comment to the people in Hollis. They say we have a council there, and we should get the council together and write a letter about this here, what Cindy's commenting on, she brought this up before, and brought it up again, and it didn't seem to be acted on, and now he says that this is not the final plan, so we still have a lot to say about what's going on. And why don't we get somebody, maybe the secretary of the council to draft a letter to them, let them know how important it is to us.

**Mr. Laird:** We have in the past and I'm sure we will in the future, as the council.

**Mr. Marzden:** Yeah, well if this thing is still in draft, let's get on it right away—tomorrow.

**Mr. Laird:** Our meeting's next Tuesday.

**Randy Fairbanks:** I'd like to make a brief comment about people's comments from Hollis being listened to. Just to reassure everybody, at least to the extent that we could, we attempted to listen real carefully to those scoping letters that came from the people of Hollis, including here Mike, we have the scoping document, this kind of summarizes the issues that we can identify in the letters that we have received, and then we tried to the extent that we could incorporate those issues, those concerns, in at least one or more of our alternatives, so that at least that way we can analyze the effects of doing it the way you'd like it to be done, to the extent that we were limited by the criteria that we still had to get 125 million board feet. But there's different ways of doing that and as you can see at least Alternative 5, I think, addresses essentially all the primary concerns from the people of Hollis. We avoided the entire, in fact, all of the action alternatives avoid the Hollis area; there's no harvest within the immediate Hollis area.

**Unidentified Speaker:** Except for Indian Creek—

**Ms. Rieves:** Yeah, Indian Creek is a major subsistence area.

THOL-10 See Response THOL-5.

**Unidentified Speaker:** But you're right, Alternative 5 does stay away from Indian Creek except for a couple of helicopter cuts.

**Mr. Fairbanks:** That stays out of the Indian Creek drainage; I think we did stay entirely out of it with Alternative 5.

**Mr. Rieves:** And 1A.

**Mr. Fairbanks:** And 1.

**Mr. Laird:** Which just means that you still have you have your 125 million to get; meaning, you didn't get it in Hollis' back yard, you went down to Chomly to get it or you went down to Polk, you didn't get it here in our back yard, you got it in somebody else's back yard.

**Mr. Fairbanks:** It's true. And in fact I think the primary difference between 5 and 2 is, 2 doesn't have too much harvest in the Twelvemile Arm area either, but 5 avoids all harvest there and shifts more over to McKenzie, and then a few other areas.

**Mr. Laird:** And I don't know of any—in McKenzie, are there any full time residents living in the McKenzie Arm? There's the lodge down there, is that correct?

**Mr. Rieves:** Sunny Cove is the one reference I saw.

**Mr. Laird:** Sunny Cove is in Chomly.

**Mr. Rieves:** Okay

**Mr. Lunde:** There's people just around the corner.

**Mr. Fairbanks:** There's Saltery Cove up here, but I don't think there's any in McKenzie Inlet.

**Mr. Laird:** And the other area being Chomly Sound that has residents living in it. And it's totally impacted by the Native cuts, over here.

**Mr. Lunde:** That brings up a point, you know, we talked about we're concerned that we address the effects on the adjacent ownership areas. One of the reasons—there's a lot of additional volume in that Chomly area, but because of the harvest that's already occurred in there, primarily on Native corporation lands, and that Sulzer Portage area has been selected or is involved in a land exchange proposal and all indications that would go through. So from an analysis standpoint, we discussed that with the proponents of the land exchange, and they indicated that if they got it they probably would harvest it at least to some degree, and we factored that into the cumulative effects analysis. One of the results of that is you don't see any harvest units within the visual corridor of Chomly, except there's one place there where you can see a portion of one harvest unit up in what we call Cannery Creek. So that was an area that we tried to factor in the cumulative, this case cumulative visual effects. Then there are other areas, like Beaver Creek watershed, there's a lot of harvesting taking place currently, and ongoing into the lower part of that watershed, and so we backed out of that one because we indicated that we'd be pushing the threshold for cumulative watershed effects. So for this plan what we did was, we just deferred any of the potential harvest units that we originally had proposed. So that we are trying to take those things into account. Once again I'd ask you that you look in there and see if we didn't make that clear, or we didn't maybe do it enough, because we're open to suggestions.

**Mr. Laird:** But just generally looking at these maps, any of these maps, you know you've colored it brown for the previously logged-off area, and the green for the standing timber, harvestable timber that's left, and you know, it doesn't take anybody with an eighth grade education to look at from a distance even, looking at that map and see the amount of brown probably equals if not is even more than the amount of green that's left on the map, or it's close, especially if you figure in the yellow, that's going to be brown in the future, and this all started only in 1954, basically, and that's not that many years ago. And you folks are talking a 100-year rotation, which is probably a dream anyway, that's probably not even a reality because the future of the island is what Hollis is

today, because this was the first modern day logging. There was logging around the island before Hollis but the first modern day mass clearcut logging was to take place right here in Hollis. And we all live in those units—all our homesites are basically within the second growth, and at this stage of the game how many years has that been, and that timber is not near harvestable yet at this point, and won't be 50 years from now probably. I mean it might be some commercial thinning but it won't be any high-quality timber. It'll be low grade; that's obvious to anybody that doesn't have a degree in forestry.

**Ms. Rieves:** One thing I'd like to add to that is that local people do not like to get caught in second growth timber for clearcuts. We avoid it with a passion. We use the old-growth corridor ourselves for reaching subsistence hunting areas or fishing areas. If you see a clearcut I mean it's just like, oh no, it'll take you five hours to get across something like that. You'll go up a 75 degree slope so you can avoid it.

**Mr. Laird:** Some of the clearcuts now in the Hollis area though are getting up to where you can traverse under, it's getting at a stage where it's starting to die off under. The overstory is choking off all the berry brush that makes it impossible to traverse, and the thick spruce limbs are dying up to where you can get under. And likewise the deer are starting to use it. I moved to my property in 1985 and never saw a deer sign, and for the last two years now we've had deer on the property, so deer are starting to use. . .

**Mr. Rieves:** It's that salt block! (Laughter)

**Mr. Laird:** It's the chicken feed. No, no but there are—I fished on the Harris River for many years, and used to I'd never—spring steelhead, and never saw deer track, and in the last three years now I see a lot of deer signs down on the Harris River, and spring steelhead. Which I never saw track one for many years, not one deer track. I don't know whether it's the stage that the second growth is getting up to where the deer are moving back in and using the area, or whether it's the surrounding mass clearcuts that have gone on in the Native lands which is driving the deer herd that used to be on that land into our area and bumping deer into places that they're normally not inclined to be; it's hard to say what's causing that. I mean it's obvious that the deer population, the resident population here, is already maxed out to some extent, and you have a mass clearcut right down on the range and those deer that were there aren't going to stay there, they either die or they move. And if they've moved into which who knows, I don't think any study has been done in that respect, so who knows what the deer have done in the Native logged-off areas. Some of them still stay I'm sure, because some deer harvest is still occurring in those areas, but not near to the numbers that were there. So just from personal observation—it's possible that the deer could be moving into our area, and moving into areas that are less productive for them.

**Ms. Rieves:** When you go into the Maybeso Experimental Area, it's real obvious that you have trees that are relatively all the same size, all the same height, that you look at the understory and it's about the color brown that's represented on the map there. You don't see any ferns, you don't see any of the types of low vegetation, because the canopy is all the same height and it's blocking out all of the sunlight to nurture the small plants. And what I see with that is what's been going on in Norway where they have tree plantations, and that's what that reminds me of, is that it's a tree plantation, everything's the same size, you know, it conforms to what logging companies would love to have to harvest. "Hey, we don't have to change equipment, it's all the same, just zip it through and cut it up."

**Mr. Laird:** But realizing you know too that there are areas within the old clearcuts, within these second growth areas, that do have varied brush and do have a break in the canopy—right now we just had those slides, cause a break, so around those slides it'll come back with berry brush —

**Ms. Rieves:** Well, except for the surfaces that are down to bedrock!

**Mr. Laird:** Sure, well that will grow back with alder or whatever grows on bedrock. Moss first. . .



**Ms. Rieves:** Lichens, yes.

**Mr. Laird:** But still you know there are areas in the clearcut, it's not all choked up with canopy. There are areas where berry brush is still maintained.

**Ms. Rieves:** I think that has a lot to do with the stage the clearcut is in also.

**Mr. Rieves:** Well Alaback and Tappeiner and those folks have pretty well documented forest succession characteristics, so that information is in hand, and his reference to the color-coded disposition as you view the island, in the TLMP Revision of course they had their set of maps too, and they used a more appropriate color, black, they had a coded suggestion for those areas which no longer really exist—

**Ms. Schneider:** We were careful.

**Mr. Rieves:** —and when you tally up things you'll find that Prince of Wales Island and its few associated small satellite islands constitute about only 13 percent of the Tongass National Forest land base, whereas for the programs that are being proffered, including Native cut, they're talking about a 55 percent portion of the total old-growth cutting effort on the island. So that's the reason the map will look the way it does. It's very disproportionate and of course we're singling out Prince of Wales; it has proximity to transport and a number of other things plus 68 percent or some number like that of those higher volume class old-growth stands in the forest. So that certainly is reflected in what Johnny was saying.

**Mr. Laird:** And also, you know, the brown areas are mainly in high volume, spruce flats, a lot of high volume old growth, which you know not only do the loggers want it, that's what the species, the deer, and the bear want also. You know, as the cut continues to take place, the mill in Ketchikan, the pulp mill, is having to accept more pieces, smaller volume logs, more pieces for the same amount of pulp, than they've done in the past. You know as this cut continues you can just look at the map and you can see that you're going into less and less desirable areas with every time frame here.

**Ms. Rieves:** I guess one of the things I'd like to see is the projection of harvesting efforts for the next 100 years. See what's as a whole on the island, what do we have of old growth in 100 years?

**Mr. Lunde:** Cindy, what we did in this EIS, we looked at the TLMP Revision's projections by decade on how many acres in each management area would be harvested. And then we looked at that, and we ran our cumulative effects analysis for 2054 which coincides with decade 6, assuming that the Forest Plan Revision will be approved in 1994. You know we have to make some projections. And we took that number because that was the period of time when the majority of the available forest areas or available timber areas that are scheduled for timber harvest or timber production would be converted to a second growth management. And with the current Forest Plan, whether it's the existing one or the proposed revision, basically that's what the primary objective of those areas are, is to manage the suitable available timber base for commercial timber where we'll be looking at a 100 to 150 year rotation period, the majority of it, and then we have scenic viewshed areas and modified landscape areas that would have a longer rotation than those. Anyway, what we did is we took the TLMP Revision's projections by decade, and we took those out to decade 6 or 2054, and that's what we used for cumulative effects. And we did that for, we broke the island into four zones: the northern zone, a central roaded zone which would be primarily where central Prince of Wales and Control Lake EIS areas are, and then the what did we call the other two areas?

**Mr. Fairbanks:** Uh, the outlying areas —

**Mr. Lunde:** The third one was primarily this road system we're talking about that ties in Craig, Klawock, Hydaburg, Hollis, you know, the existing road system, and expansion on the map, and then we said the other outlying areas that didn't fit into those categories, and then we ran the projections out to 2054, and then that's what we used for cumulative effects analysis for all the other resources, in particular wildlife, biodiversity, and that kind of thing.

**Ms. Rieves:** What number did you come back with as a number for what you have left of old growth in 2054?

**Mr. Lunde:** In this Project Area? I'd suggest we take a look at that but basically what we looked at in this Project Area in 2054 would indicate about 9,000 acres, 9,300 acres, something like that, that would be in the two management areas, which would primarily be in the scenic viewshed areas like up around Hollis, down toward the lower part of Twelvemile Arm down where the campground is proposed, and then in the modified landscape areas, and then you'd have other areas that would be out there such as Old Tom's Creek Natural Area.

**Ms. Rieves:** Okay but this isn't in the Polk Inlet part of the area.

**Mr. Lunde:** Those are addressed in the EIS itself. And here again all we're trying to do is show how this Project Area fits or doesn't fit the Forest Plan assumptions, and draw a picture of that, and that's what we've attempted to do, and I believe that that will help not only make informed decisions at this level but it'll also be passed up in the Forest Plan level. Frankly if we continue to do that it's going to look pretty bleak.

**Ms. Rieves:** Yeah, I was going to say, "modified landscapes"—the whole island would be a modified landscape.

**Mr. Lunde:** Well, "modified landscape," what we're talking about there is one of the TLMP allocation names and basically it says that we would manage for partial retention visuals in the foreground but then we would do modification in the middle ground and background. In other words you could dominate the landscape there with whatever activities we're doing, but they're supposed to follow form and texture. In other words you could see a clearcut in it but it should sort of follow the thing instead of being a big square. But you'd be able to see clearcuts.

**Mr. Laird:** I have a question maybe you could answer: what would happen if the mill did shut down, like the Sitka mill, what's happened to the Sitka Mill's long term contract now that the Sitka mill is down and they're not producing pulp, which is the terms of the contract, what has happened to all their project areas, are you still going on with the plans continuing to log those areas?

**Mr. Lunde:** At this point, I don't know all the details, but at this in time what we're doing is to continue to move ahead with our planning, assuming that the pulp mill would open back up or that something else will happen in there. That one is really up in the air at this time, but we're moving the projects ahead at this point in time. How that fits into the big picture and into the contract, the legal aspects of the APC Forest Service contract and those kinds of things.

**Mr. Laird:** Which might come around to us here, who knows.

**Mr. Lunde:** APC I do know has already sold pulp blocks to KPC.

**Mr. Rieves:** A quantification that somebody locally would get some feeling for in the preferred alternative from the TLMP Revision, in this Wildlife Analysis Area 1317, what would the disposition of the land that would be remaining according to that prescription would be 2 percent natural setting, 56 percent moderate development, and 41 percent intensive development. So Unit 1317 enjoys a great deal of attention in the long term under the preferred alternative of the revision.

There's a few items that I'd like to bring up if you've got the time to absorb them.

**Ms. Schneider:** We're here as long as you are.

**Mr. Rieves:** I was glad to see a continuation, at least of language, in speaking to concepts like biodiversity and viable populations. However, almost creating an essay on it doesn't meet the requirements of NFMA and NEPA. And I think as this process continues and no changes take place in what I have gone through, there appears to be non-compliance with the



prescriptions, and very likely subject to litigation as a result. Specifically—these things kind of blend and bounce around because they're presented that way in the volumes—but in the Revision, under Management Indicator Species (MIS), now of course, with NFMA the Forest Service has a prescription to do this; it's also a matter of tradition, but it's also very clumsy, and has great pitfalls. Now, the statement you made back in the TLMP Revision in that regard, "Population changes of management indicator species are believed to reflect the effects of land management activities." Now, right at the beginning, they're not going to reflect the effects; at best they may reflect some. The next statement is one of the main problems and that is that "Evaluation of all species occurring within a planning area can be reduced through this concept to a number that promotes meaningful evaluation." Well, whoever put that in here should be sitting in the corner with a traffic cone on their head. I would like to point out from an article here, one of the three authors is Jack Ward Thomas, I guess everybody knows that name. Speaking to MIS criteria thereto, "This covariation implied is both conceptually and numerically erroneous. Each species has breeding characteristics, foraging behaviors and diet, and habitat requirements that set it apart from others." Now that makes extrapolation from one species to another difficult or impossible.

Now, Sidle and Suring, I think were they were the ones that helped in the generation of this list, and I haven't seen that publication but apparently some of the motivation for it was socioeconomic and political decision, and I don't know what fraction of that was for ecological purposes, and also, speaking to the usage, for management strategy of MIS, there are several problems that arise when an indicator from one area is assumed to be appropriate for use in another area. Now you have the same set except for the critters that are not present of course—brown bear's not here, or mountain goat, not yet, or elk, not yet we don't think. And so, in different areas it's easy to see that there could be misleading indications, if you will, between say the ABC Islands and Prince of Wales, using the same set of MIS. And that goes on here, "Although geographically separated habitats may appear similar, subtle differences in vegetation structure or life form of dominant and subdominant plant species, floral composition, habitat and resource patchiness, or natural disturbance regimes, may influence an indicator's density or the role in the community." Now, sometimes I think he might have reference to what they call "guild indicators," but I don't know, like I say I haven't gone into the rationale for the generation of this particular list that's being proffered as some sort of indication of consequences in management actions that may be taken.

And finally: "Using indicators to assess population trends and habitat suitability for other species is inappropriate without confirmatory research, and current regulations and mandates requiring this use are scientifically problematic and financially infeasible." So while it may be a requirement along the way, it's clear that in order to use it appropriately, a great deal of money would have to be spent for baseline information. And I know that that isn't getting done.

**THOL-11** P. 3-470, it's kind of a curiosity also, a statement here once you've immediately gone through this, they're talking about the order of strigiate forms, about owls, "The abundance and distribution of owls in Southeast Alaska is not understood." So how in the world are you going to conduct something that may or may not impact them significantly? And these kinds of things exist, you know, we're talking about 300+ animal species in the Tongass, and a great percentage of that are in this Project Area even. So you're picking maybe 10 MIS—there's a lot of information not known, there's a lot of other species out there. You may say there's a lot of them, and there's redundancy, but redundancy is insurance in the biology sense, so those sort of things somewhere along the line are going to have to be reckoned with, most of it in here in the biodiversity. That's the blue book.

Well I suppose right at the beginning, the definition, and I can sort of sympathize with somebody that's going to have to deal with it, we're talking viable population, it's mentioned and it's used and it's integrated with—

(interruption for a phone call)

**THOL-12** The biodiversity sections essentially wind up making strong correlation inferences to patch size and their distributions, and that is not without tremendous correlation studies, that is not a quantification of biodiversity. If you're going to use biodiversity to indicate the real problems that are going on in the ecosystems,

**THOL-11** See Response MR-11 in Appendix H.

**THOL-12** See Response MR-12 in Appendix H.



then you're going to have to come to grips with more definition. Although the words that are used are sort of like it seems as if somebody's paraphrased some introductory ecological text, it's nice to see that in there and maybe something'll come out of it, but for example there are indices available for alpha or habitat level diversity, in between habitats or beta diversity, and then extrapolations from that to regional or continent, gamma diversity. Now, people make comments that they're subject to that and it's not an ethical MA type of deal, but nevertheless, compared to zero, it's infinitely better than making inferences about patch size and what that's going to allow or disallow. Especially when you go from alpha to beta diversity, there's a tremendous amount that can be learned and in here they talk about habitat types and their percent reductions, and still you're not getting to the core of the matter you're talking about. And, as these timber programs continue, and fragmentation along with it, somewhere along the line, the Forest Service, not even now, cannot demonstrate that there will attain a stable limit cycle type of equilibrium. Because what we're going to wind up with is this matrix of patches that are mostly transient due to the rotation schedules.

And so what you have, you have patches of highly varied quality, blinking in and out of existence. There is no baseline data to show how this affects the biota, especially critters. The more sessile of the plant world kingdom, they're given a research natural area or something and they have reasonable protection; they don't get up and walk away. Somebody might walk on them. But there is a bit difference. So the discussion is, I'm glad to see the discussion about patch sizes and how many of them, and their kind of activity, which is different from what I think is going to be available on the ground, and it is appropriate and necessary, but that is not sufficient, I'll mention that. The goals of maximizing biodiversity and maintaining functioning ecological systems are at least as important.

Now, it is pretty much a general consensus that at one time there was what was referred to as the SLOSS debate, and that was Single Large or Several Small reserves for conservation. And, small reserves, or patches (of course that patches in here are not the same thing as reserves, they're different characteristics) they can contain as many species as an equivalent area—a large one. But that is only valid at the point of demarcation. And that point of demarcation type of concept is what is used in this Polk Inlet presentation. The time frame is highly constrained, and even the projections to 2054 bear close scrutiny in that regard.

A good definition, for people who are concerned about what is going to be a viable population of certain species, and once again, the first thing you need almost to the average person down here is going to talk about is deer. And that, of course, interfaces with the subsistence issue. Of course they have their own life. On this island, the wolves like them too, so we've got competition with the wolves; they were here first, and on and on. One of the things that's not presented in here, and I don't see any indication of it at all, both with respect to species and with respect to animals as well as to the flora, is explicit integration of risk factors in computer models for what's going on. And, when you start talking about viable populations, at some point you've got to say well, of course that includes area and suitable habitat, but at some point somebody's going to have to say, "if we get below this many effective breeding members of a species, you're out of luck, because they're going into extinction." How many that may be anywhere close to that in the Tongass, I don't know. There are threatened and endangered species, sensitive ones, but in any case, I don't see any indication at all of that risk factor thrown in, and so it doesn't make any sense really, especially with these longer year projections. When you're not, for example, for species, including demographic stochasticity, you're not including environmental stochasticity, and we just had a taste of some of that, and as this fragmentation, matter of fact, you might very well be here, in certain parts of the Prince of Wales, you have genetic stochasticity, random drift, and you have the potential inbreeding problems with these megapopulations that are being set off, and over a period of time genetically bad things obtain.

Now a couple of comments on that specifically is that, and I'm going to quote here from another article directly in this matter: "Examination of the distributional patterns of species that occur in insular or patchy patterns can

provide a first approximation of minimum area requirements, and given some estimate of densities, the minimum viable population sizes. However, that type of approach requires that species communities occupying such habitat patches are in equilibrium and the approximate length of their isolation is known." We don't have that baseline data.

In that regard too there is apparently no clear relationship, either theoretical or empirical, between the percent of occupied patches of a certain size and the potential longevity of the populations that they support. And finally, on these patches, "An additional complication with this approach is the population characteristics like density, mortality, fecundity rates. In many species they show wide variation from one part of their range to another depending on habitat quality and community structure." We certainly have got that gradient from the bottom end of Prince of Wales up to Yakutat. "Two habitat patches of the same size may not support equally large or enduring populations —" Everybody knows that. "— and such habitat differences are critical to wise conservation planning and any research efforts, if they exist, employing that approach."

**Mr. Lunde:** Tom, can I make a comment? A lot of the stuff that you've got there I think is supposed to have been dealt with at the Forest Plan Level.

**Mr. Rieves:** The fact that it's not reflected is the reason I'm bringing it up.

**Mr. Lunde:** Okay that's a good point. Just to let you know how this stuff was developed in the EIS: primarily what we did, we assumed that what was in the Forest Plan, maybe assumed isn't the right word, but we took that as a given, and then what we tried to do is show how the proposed actions or how those things would sit on the landscape within the Polk Inlet Project Area, would fit or not fit. And then a lot of the things you're talking about, the patch size effectiveness, corridor options connecting the bigger blocks that we know have been set aside from timber harvest such as Karta Wilderness, Old Tom Creek, and then South Prince Wales Wilderness, as examples, and then what's going on within the Project Area that would connect or interconnect those over time. And you mention I think value or you mention function of those things, and what we tried to do was start focusing on those so that if we had a proposed harvest unit or a group of units or roads that would fragment one of those key areas, that we would display that effect of it. That was what the approach that we took, it was more like trying to show how it fits or doesn't fit, rather than get in at this level and address all these things that you're saying, which, I'm not disagreeing with what you're saying.

**Mr. Rieves:** Well of course you're mandated in a certain regard, and that of course, talking about all these things, you get into the details with specific ignorance of the prime moving force that's at hand, and of course you go back to the beginning and the need and the purpose for the things that are presented here, is a back-to-front type of approach, it's backwards. What's happening of course is that you're going on a specific timber target and that's been going on all along, and then you're just trying to make all these other things which are clearly becoming much more important than any timber target value that you can imagine. And you're just trying to shake it out, and say things that look like they're in conformance with NEPA and NFMA. There is no specific dealing in anything I've come across in regard to what I've just said. And of course—I mean, I'm not quite finished yet. Over here in the Polk manual, in the biodiversity section, a rather dismal projection here, in your language, "Each of the action alternatives would result in substantial reductions in the percentage of forest habitats in the 10,000-acre size class, particularly the percentage of interior forest habitat." And then the sentence, "The number of large patches, and patch interior habitat, would decline further as additional areas are entered for future timber harvest."

I guess the clincher over here, the ultimate dismal, for our area, and that's page 4-116, next couple of pages and you've got a map over here too. By the time all the dust settles, 2054, you're making the statement that "Landscape level biodiversity would decline significantly within the Polk Inlet Project Area by 2054." Yeah, and I—that's sort of an optimistic understatement of a much more critical condition and time frame. It says, "At this time about 25,000 acres of old growth would remain, distributed in the Maybeso Experimental Forest, the Old Tom Research Natural Area, and then these beach and estuary fringes, riparian



corridors, and so on. If the remaining old growth in the Maybeso Forest is harvested then only one significant old-growth block would remain. All other old-growth habitat would consist of small patches or linear corridors with little or no interior habitat.” So, this just confirms what I just was making conversation about. The baseline is always moving—you cannot appropriately in a scientific way tell what’s going to happen with any reasonable confidence interval. It is a major failure of the Tongass National Forest management, and there was somewhere in here there was mention of these HCA’s, same type of thing as for the spotted owl, but it’s not reflected in any map that I’ve seen yet. And, in other words, it’s another one of these association by conversation concepts and it’s not going to be operationally effective the way I see the cutting level potential shaping up. In other words, the ecological society, all the people in conservation biology, there’s not much disagreement anymore about what is necessary if you’re trying to maintain species and biodiversity and functioning ecological systems. That is, LARGE patches, LARGE. Patch isn’t even the right word any more. Closely related in space, and connected by corridors that are sufficient for the purpose of dispersal. And I don’t see that anywhere. As a matter of fact this island, it’s got top sergeant stripes in effect, and so there’s absolutely no telling what the long-term consequences are going to be in this place, because of that type of destruction of the forest.

**Mr. Lunde:** Do you see what we, okay I’ll talk as a planning team member here, do you see what we’ve done? What we’ve done is to take the Forest Plan assumptions, and we’ve tried to show how they fit or don’t fit in this particular Project Area. And what, okay, you use the word dismal here, dismal predictions. That’s using the Forest Plan’s projected numbers on this, and so what we did was try to paint a picture. Given the direction that we have to work with, and that’s the Forest Plan implementation, in that direction it does not include the HCA’s or those kind of things. So what we wanted to do as a planning team was to help our decision makers make the most informed decision. Number one, to look at, are we foregoing, if we take 125 million board feet with this EIS, are we foregoing options to better meet the things that appear that we need to, biologically down the road. And then, how far down the road can we go before maybe we’ve passed some threshold. And then we tried to paint a picture of what this particular Project Area would look at some point in time. The fact that we come up with something dismal indicates that maybe this particular Project Area does not fit the Forest Plan assumptions very well. And I, my hope is, that when we pass this up the line through our decision-making process and as input or monitoring, if you go back to the Forest Plan, the flags we’ll be flying, we’ll say “hey, maybe we better take another look.” That coupled with the current situation of us as individuals becoming more aware of the things you’re talking about and the need for those kind of things in the political process and whatnot, that hopefully the planning team in this case has done the job that we can pass that information up that will, whoever makes decisions one way or another it’ll make an informed decision, and that’s really what the role the planning team is in this case. So I’m not trying to refute anything you said but just so that we understand what the role is—

**Mr. Rieves:** You’re just describing your job.

**Mr. Lunde:** Yeah well—

**Mr. Rieves:** Everybody’s aware of your job, and your job is subject to question too as far as that goes, and just as an aside, the Forest Service had a golden opportunity back three years ago, when they had the Reform Act, back in D.C.—at that particular time, there was plenty of evidence in ecology, conservation biology, of the type of direction and activities that should be taking place. Instead, the management of the Forest Service was stonewalling as hard as they could, Ted Stevens was helping them, and the timber industry was pushing both of ‘em. They were trying their best to delay the whole process, saying, oh, we got revision in the process. At that point in time they could have stepped forward with some probity and said, “look Ted, we’ve been making mistakes, it’s time to back off and do things completely differently.” Well that didn’t happen by a long shot. So we’re continuing with the same kind of driving force, the animus that’s been in existence before, okay? And it’s kinda hard to just say those things too when you look at, the Tongass is just part of the world of course, and the world is now filled with approximately



five and half billion people. And it's obvious the pressures they exert on the finite resources that we've got.

Unfortunately the political arena and the capitalistic system like large numbers because that means more receipts. So when you hear anything in Congress you don't hear somebody get up and say we're going to have to do something specific about this population problem. And, what is happening and, this analysis occurred back in the '80's is that one race, *Homo sapiens* (I refer to him as H. sap because it has a much more reasonable portrayal of the character of the beast), H. sap is co-opting more than 40 percent of the net primary productivity of terrestrial products, and that's increasing right along as the population grows, and there is market demand, one of these nonsense type of concepts that come in with respect to a finite resource base, and the mill is, it's an easy target. You talk about jobs and economy, and that's an endless loop argument. More people, and it just keeps on going. And, this tremendous disproportionate use of resources is at hand. Now, I don't have any particular animosity to the Japanese or the Chinese or the Koreans, but they're getting 80 to 90 percent of what's been going out of here over the years, and this is what we're being left with. So the accommodation of this egregious population situation cannot be done. Things are not going to hold together.

And that is another role that the Forest Service ought to be taking a more positive step role in. I never hear anything about that because it doesn't bring in very good receipts. But that's the cruel fact of the world matter, and somewhere, and it's coming closer, Alaska's population in essence is being replaced every two days, the way the growth curve is going. It's going to have to be continued with in one tough way or the other as this keeps on, and a lot of the consequences are right here on Prince of Wales. And those are some of the very type things that I think about in response to future cutting plans. It's not just Hollis. It's not just Prince of Wales. It is a global issue. And global change is at hand. How is that going to affect regrowth of large silvicultural systems? (Shrug/I don't know sound). Everybody just keeps on mowing it away. There's a lot of very important questions that aren't being—the words aren't even there. So like I said it's nice to see at least the words and the discussion put in here, but what is being done about it is dismal at this point. And if it's reflected in any reasonable short term, there may be some good things that are left, so to speak, in the Tongass. I don't really know how bad some of the damage effects are and a lot of professional biologists don't know either because that baseline, number one, was not there at the beginning and it's been shifting right along with the cutting—with the work that's being done.

**Mr. Lunde:** Good comments.

**Mr. Rieves:** Other than that I think you're doing a good job.  
(Laughter)

**Mr. Lunde:** Anything else?

**Ms. Schneider:** If we have no further statements. Thank you for coming. Your comments will be reflected in the final EIS to the degree appropriate and necessary, etc. Thank you very much for your input. As I said written comments must be postmarked by November 24. I have a feeling we may hear from some of you again.

**Mr. Lunde:** I would encourage that. It's encouraged.

**Ms. Schneider:** Absolutely.

**Mr. Lunde:** To get your thoughts and comments in.

**Ms. Schneider:** Because remember these alternatives can change as a result of your comments. New alternatives have been developed as a result of public comments.

**Mr. Rieves:** Well, the last comments I made, I see Alternatives 2, 3, and 4, so I have a hard time with the correlation in there. Now, 5, like you mentioned, that leaves an out.  
(Laughter)

**Mr. Fairbanks:** That's right, and that's where that came from. Remember, we get comments from all over, all different kinds of interests, so we have to balance all those different kinds of interests and we try to develop alternatives that reflect all the different issues so we can analyze the effects, lay it out for the decision-makers.

**Mr. Rieves:** Sure. But once again—a lot of people are not provided with an extensive education. They're hard workers, and over periods of time, certain industries, and those lovely politicians, have not been telling the truth to people. It's always, MORE, GIMME, ME, MINE, in the essence of the procedure. And, naturally you're going to get these precipitous confrontations. People that are environmentalists are "tree huggers." Got "snail darter." What are people supposed to think about Endangered Species Act, I mean you know, they're put in a camp. You're against the owl, and so and so and so, it just keeps right on going. Now, Forest Service, once again, is fairly close to the earth. They have excellent people I know in these research stations, like in Portland, up in Juneau; but a lot of their input doesn't at least get out in a strong form, I guess that's a polite way to say it. People could be persuaded over time I think if the appropriate role models are given to them. In other words, a functioning biosphere or not, is not an option. I mean you know, there's oxygen, there's nitrogen, there's water—these things are being affected. Global change. Bio-geo-chemical cycles are being affected. And, a lot of people, it's thrown around, and no—people in strong positions are not really saying things in a strong way in support of that point, not that they, you know, biology is not an option. You get to the end and that's it, Bud. The infinite substitute-ability type of concepts are long gone. Every time you replace something in an ecological system that was there in a reasonably natural form it always creates some sort of a problem. At best it's neutral. So—

**Ms. Rieves:** It reminds me of analogy I came across—someone else wrote about being in a hospital under intensive care, and someone says, oh well, we've got a problem here with our budget and we need to take some of the parts off of that life support system that you have there, and that doesn't look very important, that's just a little knob, I guess you could have that and so they take that and then come back and say, well, what about this hose thing? That doesn't look—wait, that's the tube that's feeding me oxygen, stop! And that's sort of the place where we're at now with how things that are lining up. We've got to say STOP. We've gone beyond what we can sustain without endangering not only every other living species but exterminating ourselves as well.

**Mr. Rieves:** You were the team leader, right. On the unit design cards I see your name. I guess it's just sort of a curiosity. I was looking at one of those over at Indian Creek, I guess I'm naturally drawn when I see areas that are in Indian Creek, one of those units. Well in any case one of the people that were out on the site under the wildlife comment section, and you look in the back you know everybody's listed, and I look at it and he has a bachelor's in English. Of course, I mean people become self motivated a lot of times and they're capable of a tremendous amount but the match there sounds, has a tendency to be quizzical.

**Ms. Schneider:** I think he had a master's in fisheries biology, too—

**Mr. Rieves:** In terms of, based on that he's saying this about wildlife. You see what I'm saying?

**Mr. Fairbanks:** Yeah, we didn't have every individual expertise and every discipline at every single unit on the ground. We had interdisciplinary trained teams of people who went out; they conducted interdisciplinary training before everybody went out; then we had the wildlife people go to the units that had the most concern about from a wildlife perspective, and we had wildlife biologists review all the unit cards with information from the person that was on the ground. It's pretty expensive, there's a lot of time involved in getting around to 300 or 200 sites and doing a layout and looking for soils and all the problems. That's of course the idea here was to try to identify the feasibility level of the problems that would occur.

**Mr. Rieves:** Oh I know that. I thought it was kind of funny, just one of those

items along the way.

**Ms. Schneider:** Did he write his observations well, I mean were they punctuated correctly?

**Mr. Rieves:** Funny you brought that up. Except in very few occasions, there was apparently an acceptable generic comment for wildlife. "No concerns and leave snags and a few reserve trees, live reserve trees. Moderate deer sign." One place I notice they had really smelly, overpowering bear sign. And of course there is quite a bit of traffic, we have the bear running across Maybeso drainage across the road down over to Harris and up Indian Creek and up the drainages, and of course I'm quite sure there's denning up in there because that's the appropriate type of country for 'em.

**Mr. Marzden:** I've been there about 18 years and you know it's nothing to see 16, 17 bears every time you go to Craig. Every day.

**Mr. Rieves:** Well I don't know, well I don't go every day. I go about every ten days or two weeks and I'm telling you, depends on the time of day, I don't know when you go, but in the last I don't know, the last four months, going over to Craig, I've only seen about five or six bear and bulk of that came in a clump, she had three with her this year, and that was over by the lake over there. I know that there's another influence locally, there's a fella that generates business, people coming up from down south, he has a transporter license, and they go out and manhandle the bear population, and I've noticed over the past ten years a very distinct lack of the same kind of signs that I saw before that, and especially over the last three or four years. Doug Larson, did you ever meet him over in Ketchikan? He's their wildlife bi—I've got his recent layout, he breaks down all this bear harvesting into a number of aspects, and you can kind of see there's some peaks in the matter. I don't know, they're resilient and also apparently, this average skull size has maintained a constancy, which is indication that they're not getting into younger crops, but I haven't seen a morphometric breakdown on the black bear. And they only recently started taking age requirements. Now they're requiring age determination and sending it down to Montana. And that may start showing something a little different because he's getting averages. As many as are being taken, I think its amazing if the population is doing well cause there's a lot, it's a large number, the harvest.

**Mr. Fairbanks:** Being harvested? In this area?

**Mr. Rieves:** MMMhmmm. Yeah, the harvest. Well, 1317. I think they been going up north quite a bit, you know, the road system, down towards Hydaburg.

**Mr. Johnson:** A couple of brief comments on that. We do have information as of this past hunting season, from ADF&G, that this was the first year that there was a slight decline in the skull size. That's for the whole GM Unit 2. We're not sure if that was just a blip in the data or if it's more than that. Secondly, the fact that the state made the decision to reduce non-residents to a one-bear limit, I think it was two years ago, also, among biologists we believe had a significant positive effect, long term, on just what you're addressing. We are however, seeing that where the bears are being taken, there's a high concentration in the Klawock - Trocadero area.

**Mr. Rieves:** 1318, right?

**Mr. Johnson:** I believe that's correct. So the total numbers of bears coming off the island are not just coming island wide. There's like little pockets—

**Mr. Rieves:** There could be local deficits.

**Mr. Johnson:** That's one of the reasons why we are concerned about what some people might think. We are tracking that and monitoring that rather closely with ADF&G to see if this is just a blip or if it's an indicator and maybe more stringent recommendations need to be made.

**Mr. Rieves:** Sure. It's a pretty liberal season too.

**Mr. Marzden:** This is the most bear I've seen for oh, six seven years.



**Mr. Rieves:** Do you smell like a fish, Stan? Where do you go? (Laughs). Well they're around. I go up to Maybeso quite a bit, and if I don't see them, I see their prints.

**Unidentified Speaker:** There are a lot of bears at alpine this year, many more than I've seen in past years.

**Mr. Rieves:** Is that right!

**Unidentified Speaker:** In the high alpine. Singles and mothers with cubs, both, to a great degree, more so than the last several years.

**Mr. Rieves:** Well good. So you don't go off and leave your deer on the ground! Good, that's good.

**Mr. Marzden:** How many bear come up there a year?

**Mr. Johnson:** I don't have those numbers in front of me, I would say, if you're interested in that kind of information all you have to do is drop us a line and we can sure give you copies of them because the information we have is from ADF&G, and there's some additional information we have ourselves. We work more closely than some people may know too, between Forest Service and the state, particularly on National Forest lands. And we're going to be helping fund part of the aging project that'll be taking place for the teeth that have been taken over the last several years, primarily from Prince of Wales Island. So we'll be able to tell specifically what that age distribution is and what kind of recruitment we're getting. It should answer a number of questions for us in terms of the black bears.

**Mr. Rieves:** So they ought to be able to generate the curve then in terms of skull size and age. I don't know if it'd be similar to brown bear or not. I haven't come across any articles that give that data. I have on brown bear but I haven't on black bear.

**Mr. Johnson:** The good news is, for the number of black bears being taken, for the high number that are being taken, there appears to be relative consistency in the age distribution based on skull size. In other words there's a smattering of big, medium, some small. It's largely reflective of the people that are hunting bears that don't know a big bear from a little bear. If it's the first bear you've seen and you're here to bear hunt, if it's the first time in your life that you see a black bear, it's a big bear, so—that's what is driving some of our problems with some of these small bears that were being taken. Guy gets back to camp and says, "Big bear Charlie." And Charlie says, "Yeah, thanks, you should have seen what I SAW." All of a sudden that's when people are getting into killing two bears, and sometimes leaving a second bear. So I think that was a real good decision. So much for the black bear discussion.

**Ms. Schneider:** Thanks again.

## End of Hearing

### ANILCA Section 810 Subsistence Hearings Polk Inlet Draft EIS HYDABURG, ALASKA November 3, 1993

**Judy Schneider:** For the record, this is a public hearing for ANILCA Section 810 for subsistence for the Polk Inlet Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Ketchikan Area Independent Sales Program. Today is November 3rd, Wednesday, and the time is 4:45. The hearing is being held in the City Council Chambers in Hydaburg, Alaska. The purpose is to obtain comments on how the alternatives proposed by the project may affect subsistence use in Tongass National Forest. The hearing is scheduled to run until 9:00 this evening. If you'd state your name and spell it, prior to your statement, we can begin.

**Mary Morris:** Mary Morris (spelled). My concern about the Polk Inlet logging is against my belief because they're taking too many trees and it tends to take away the rain or the subsistence that we live on. One thing that happens is on Long Island. Long Island no longer has any deer, and the wolf are coming over and taking over the deer that we live on. And the rain is important for the fish to go upstream and this past summer or past two summers we notice that there's too many fish that are trying to go upstream when there's no water. I guess—Is there any questions on it?

**Larry Lunde:** If you have questions, we can answer those.

**Ms. Morris:** Yeah, I have questions on the watersheds. You know, the watersheds are real important here on the island. We have to protect it, by not logging around them. And, when they build roads, like the logging roads, we tend to use it for our own use but, you know, we're taking chances, you know, because of the landslides, of which we're having a lot. Questions on the contract of KPC, you know how long this contract's going to be? What's the next step after Polk Inlet?

**Mr. Lunde:** With the Forest Plan, what we look at are areas that are available for timber harvest, and then we will continue to harvest in those areas periodically over time. And, our hope is that as we log the different aspects of the old growth and the second growth, that the new stuff grows up and in the future we'll be able to log that as well, so that there's a sustained timber harvest opportunity there.

**Ms. Morris:** Then you'll be looking at Hollis, right? Is that the second growth now?

**Mr. Lunde:** That's where a lot of the second growth in this area is, and yes, we'll be looking at that too.

**Gary Barlow:** There are some areas out of Polk that are over 40 years old and that have significant amounts of really nice second growth coming along right now, and probably within another 30 to 40 years some of those will be ready for harvest again, should we choose to go that route at that time.

**Mr. Lunde:** We'll probably be looking at doing some thinning in those areas, maybe putting some small holes in the canopies so we can get more vegetation underneath, especially in areas where the deer use in the wintertime. And then we would take those probably at least to a hundred years old before we would regenerate them. We'll probably be doing some harvest, taking some of the trees out of there but not all of them. That's what I would speculate that we'll be doing.

**Ms. Morris:** The trees are important to leave as long as you can. As I said, you know, I guess we're a rain people, and we know what the rain brings, and that's the food that we eat. And you know, we do basket weaving, you know, from cedar trees and the spruce roots. We also think that's important. Right now we're looking at making a heavy canoe out of a cedar tree, but it has to be a certain cedar tree, and a long house. But, the forest around us is very important. We can't just skip over to the store and buy what we need for the day. Being a traditional, you know, it goes in cycles, and right now it's the deer season, and there's no deer because there's too many wolves. And that's my statement.

**Ms. Schneider:** Thank you Mary. Very much.

**Mr. Barlow:** I'm just curious. Would you like to talk a little about your collecting of cedar bark?

**Ms. Morris:** The cedar bark is collected in May, the first of May. You can see the trees that are stripped, you know we don't kill the tree, we just strip it, you know, and then we go on to another one. We have to watch, you really look at the trees that doesn't have too many knots in it, we try to look at a straight tree and then—

**Randy Fairbanks:** So you get long strips.

**Ms. Morris:** —then we just strip it off.

**Mr. Barlow:** Are you looking mainly after yellow cedar, or red cedar too?

**Ms. Morris:** Both.

**Mr. Barlow:** I'm curious, how do you feel about going to areas to strip bark prior to logging them. If you know it's going to be logged, how do you feel about going in and stripping some of those trees?

**Ms. Morris:** Yeah, it'll be all right. You know, we have just certain places, one elder told me where to go, and if you open it, let them know it's ready to go, I'm sure—

**Mr. Barlow:** They would be interested—

**Ms. Morris:** —they will be interested.

**Mr. Barlow:** Are there a lot of ladies that get together to go out to strip bark?

**Ms. Morris:** Mhmm, there's quite a bit of ladies. People come in from Ketchikan and get the cedar.

**Mr. Barlow:** I guess, what I was thinking about, that sometime in May or prior to May I could let you know where units are where I know we're going to log, if it's got a lot of cedar in it, and then I could tell you where it is and you could go strip bark there. But I didn't know if that angers you or frustrates you knowing that the trees you're stripping bark on will be cut down afterwards.

**Ms. Morris:** Yeah, like I said, just leave things alone if you can. I want to say that. But you know you're pressured into giving this, the trees away.

**Mr. Barlow:** I've noticed that many of the trees along the Hydaburg Road, and off some of our other roads, have stripped bark, and I thought that maybe folks might be looking for other areas, also because the pressure that's on their, because those trees will eventually die once you, after you continue to strip them. So that maybe we could work something out to where it'd give you a better opportunity to strip some of the cedar.

**Ms. Morris:** I'm sure that, if you let us know. I guess we just work around our community.

**Mr. Barlow:** Is it best for me to contact you?

**Ms. Morris:** Probably.

**Mr. Barlow:** Okay. I will remember that then.

**Ms. Morris:** And for the cedar roots. I've been asking the loggers to give me cedar roots.

**Mr. Barlow:** So they bring it in for you? (laughter)

**Ms. Morris:** No I never got any yet, but I ask.

**Mr. Fairbanks:** Spruce roots or cedar?

**Ms. Morris:** Yeah, spruce roots, you know, we use that a lot too.

**Mr. Barlow:** You tell me who the loggers are, I'm sure they'll do it—

**Ms. Morris:** But, yeah, I think it's important for them to know that we use it.

**Mr. Lunde:** Does it matter what time of year you get those?

**Ms. Morris:** Probably in May too.

**Mr. Barlow:** Also in May.

**Mr. Lunde:** I was just wondering. It'd be muddy but with some of these that have just slipped down the mountain and that are by the road—



**Mr. Barlow:** Easy to grab

**Mr. Lunde:** Some of those may have some hanging there.

**Ms. Morris:** I ask because I want them to know we do something with the cedar. And we also do the totem poles.

**Mr. Lunde:** Are there any areas within the Polk Inlet area that, maybe, are more important than others? I don't know if, I'm not saying that right but—

**Ms. Morris:** Yeah, I know what you mean. You know, they said to go along the freshwater streams or in the bays, that's where the cedars grow. Wherever there's fresh water, there's cedar there.

**Mr. Fairbanks:** Down close to the streams.

**Ms. Morris:** Yeah, down close to the fresh water there's always a cedar tree there.

**Mr. Fairbanks:** The biggest ones, the best ones.

**Ms. Morris:** Uh huh.

**Mr. Barlow:** On a lot of our high elevation we get lots of yellow cedar, not red cedar, yellow cedar's what's at high elevations.

**Mr. Fairbanks:** This wolf increase you're talking about, is that mainly on Long Island or is it other places too?

**Ms. Morris:** Probably other places too because I notice, you know, when they start logging back here—I want to point out back here, you know back of Hydaburg. The ducks, the birds are coming to—down a little bit, there's more than one group.

**Mr. Barlow:** The wolf population you're talking about from Long Island is because the wolves have come off of Long Island to inland?

**Mr. Fairbanks:** Because of the low deer population.

**Mr. Barlow:** Long Island has been an extreme area of—there's no deer population.

**Ms. Morris:** And that's what's happening here too. Like I said, leave the trees as long as you can. Or—kill the wolves. They're taking too much, the wolves are taking too much, and the logging companies. They're taking too much, too fast. We'll need to adjust to it. Because we can't always go to the store. We depend on a lot of it here.

**Mr. Fairbanks:** Has there ever been any traditional use of wolves, in any way? No long-term—

**Mary Morris:** Wolves? No, just for dancing. The dancing here.

**Mr. Fairbanks:** The headdress, yeah.

**Ms. Morris:** There just in our way. They have their space but it's a little too much. And then one of the old people said you know, when you cut down trees, just the salmonberry bush that comes back. It's real hard for the trees to grow in.

**Mr. Lunde:** Certainly in some areas.

**Ms. Morris:** And that's something to look at. I mean, it's a wild root. I don't know what else to say.

**Mr. Lunde:** You did very well.

**Ms Schneider:** Very helpful. Thank you.

(Pause)

**Becky Frank:** My name is Becky Frank (spelled), P.O. Box 205, Hydaburg, Alaska, 99922. My Haida name is Kholkhadolth, my family is Yadaskitla, where I come from is Kaigani Haida. I am from the Haida Nation. I wrote a letter to the Department of Interior, the Bureau of Indian Affairs, and also to President Clinton and Governor Hickie. I wrote a letter to the Assistant Secretary to the Bureau of Indian Affairs, Miss Ada Deer.

"I would like to send a special thank you to Ada Deer for announcing that we the Haida are recognized on the list by the Bureau of Indian Affairs preamble on recognition of tribal government. We the Haida people have congressional documentation on voting against the Alaska Native Claims Settlement Act on behalf of the Haida Nation. As the Tlinglit and Haida Nation hasn't been recognized as part of the Council, only as a delegate since the Central Council came into effect. As far as our Haida people are concerned, we are only a survey census for the Tlinglit and Haida Central Council's administrative economic base. Knowing our own people here in the village of Hydaburg as a Haida tribe go without cash developments from Tlingit and Haida Central Council, we are a minority to a majority tribe.

"We, the Haida people, since the Statehood Act, have had governmental problems, and before the Secretary of State, with promises of a better life, then before the Secretary of State, we had the Christians acting on behalf of the United States, promising our Haida people a better future. All we have seen through our great grandparents, grandparents, and our parents, and now we as parents are concerned about the future of our children and our jurisdictional boundaries, which we made treaty with the Tlinglits in the middle Klawock Lake out to Haida Katnois Island over to by Thorne Bay south to the Queen Charlottes. That is our jurisdictional boundaries of the Haida Nation. The land and sea has been raped of our resources for far too long. The State and Federal government and the ANSCA corporations have been dependent on our environment for economic cash developments.

We the people of the Haida Nation are in economic genocide, with our land and sea getting raped of our resources from the United States. We the Haida people have never made treaty with Russia or the United States. Yet today in the 21st century we are still getting treated like sold slaves or cattle."

Thank you.

**Ms. Schneider:** Thank you.

THYD-2

**Ms. Frank:** Polk Inlet is part of the Haida Nation. You know because we haven't made treaty with the United States, we haven't made treaty with Russia. But yet here today, you come in and we have 12 people that had signed us away or voted our rights away in 1959, to become part of the state, and that wasn't my grandparents. And I feel—I'm a parent now, and I have a son who's 18 years old and pretty soon I'm going to be a grandparent—and right now today the ANSCA corporations, you know, they're trying to tell us that we should be proud to be Haidas because we have 17,000 acres. Well as far as I'm concerned we have millions of acres here, that has been raped. I mean, I talked to a lady that worked for the Forest Service, and she said, "You know, if you don't go testify," she said, "because the Forest Service that's logging that land at Polk Inlet, a lot of it is called 'scrub land,' and it's not a very good area to log off in the first place, and besides that it's the second growth." And I said, "Well, as far as I'm concerned you guys have been logging in our country for far too long." I said, "They've been taking billions, the Forest Service has been taking billions and billions of dollars out of my country."

And three ago they decided well, we're going to give Hydaburg a big helping hand. We're going to give them a \$147,000 on the forest receipts. And that's out of how many years of logging in my country. That's out of watching these people around here go without jobs, and live in poverty, and the United States coming in and saying, "We're going to have local hire, we're going to come in and put you to work." But when it comes right down to it, they bring in the people for the local hire. So I just, as a concerned parent and as a person of the Haida Nation, I feel like I have to voice my opinion too, because I know a lot of other people that feel the same as I do but they're afraid to come out and talk.

THYD-2 Comment noted.

**Mr. Barlow:** Why are they afraid to come and talk?

**Ms. Frank:** I don't know. Well, it's like, you know, a lot of people are afraid to come out and give personal testimonies, or let alone speak in public.

**Mr. Lunde:** I think that's very true. I would be nervous to do what you just did, and you did very well. A lot of people would—go do something else.

**Mr. Barlow:** If people feel so strongly about it, it's very important to do it on record.

**Ms. Frank:** Yeah, it's important to me. And I do leave a paper trail.

**Ms. Schneider:** We have some written forms here, Becky, if you want to take some with you, if you have friends or others who you think might want to share some views. They're kind of self mailers, so we've made it real easy. They just need to be folded in half and a stamp stuck on 'em.

**Ms. Frank:** So I could just take a couple apiece?

**Ms. Schneider:** Take as many as you'd like, really, as many as you think you can use. Because it's real important that we get people's views.

**Mr. Lunde:** Can they make copies too?

**Ms. Schneider:** Sure. I've got a lot of them though. They need to be sent in by the 24th of November, that is a caveat that you might keep in mind.

**Ms. Frank:** Well, are you going to leave extra copies here?

**Ms. Schneider:** I'd be happy to do that, I'll leave them on Mary's desk, with a note to let her know.

**Ms. Frank:** Yeah, cause that'll be good, and besides I'll pass the word too. I hope more people do come by and testify. Are you guys going to be going to Kasaan?

**Peter Carr:** Next week.

**Ms. Frank:** Oh, next week?

**Ms. Schneider:** Next Wednesday?

**Mr. Lunde:** Yes. Wednesday afternoon. Actually right at mid-day.

**Ms. Frank:** Oh, what time at Kasaan?

**Ms. Schneider:** Ten till one. In the community hall.

**Mr. Lunde:** That's what folks there indicated was the best time.

**Mr. Carr:** That's when the plane comes in so that's when folks come in to get the mail. So, everyone's gathered in the community hall to begin with.

**Ms. Schneider:** We didn't know about the basketball game tonight.

**Ms. Frank:** I know. My kids were excited to go.

**Ms. Schneider:** Is Ketchikan a big game?

**Ms. Frank:** For the kids here; it's exciting for them to come over, for all the kids that come into town. So where are you all folks from.

**Mr. Carr:** Seattle.

**Jack Lobdell:** Anchorage.

**Mr. Fairbanks:** Seattle area.



**Mr. Barlow:** Craig, Alaska

**Mr. Lunde:** Over by Ketchikan.

**Ms. Schneider:** This project, Becky, the Forest Service contracted with the Seattle firm the three of us are here representing, to conduct a study in consultation with the Forest Service. That's why we're up here.

**Ms. Frank:** So, what do you guys think of tribal sovereignty or, you know. You come into our village and want our personal testimony, but what do you guys think about us fighting for our country?

**Mr. Lunde:** Well, I think if I was in your shoes, I would say, I know if I was in your shoes I'd feel the same way.

**Ms. Frank:** Yeah because we are raised going to school, how we should be respecting other nations you know, like going over to Britain and Ireland and Norway and Sweden, you know, and respect other nations within the world, and they teach our children right in our high school. You know you have nations within the United States that are not recognized.

**Mr. Barlow:** I personally have a hard time perceiving your point of view just because I was not brought up that way. I respect your view and I respect what you're saying, but where I was raised the 50 states were all a part of our agency, and prior to coming to Alaska I didn't know that we had this problem. I think many of our citizenry do not understand or do not know the way you feel.

**Mr. Lunde:** That's very true.

**Mr. Barlow:** That's a message that just hasn't gotten out to a lot of people. And before I came to Craig I did not know that there were these kinds of problems. And I have felt very comfortable moving from place to place because I felt it was all part of my nation and I cared about it. I've never felt like I personally was taking anything from anybody. Again, that's how I was raised as a child, that the 50 states were a part of our nation.

**Ms. Frank:** We're just a part of those 50 states but we're a nation within a nation that hasn't been recognized for far too long. We're Haida Nation, that for our spoken treaty that was foretold to us as children from our great grandparents and grandparents to us as parents, that we made treaty with the Tlingits and the middle Klawock Lake south, and we should always respect that land. And to see our land getting desecrated—you know, for me as a parent, living here for 17 years, and going through the last 17 years and seeing the logging that has been going on in my country, and us having to live in project homes. And we're a Haida people that have been used to fishing. That was our lifestyle. But yet, that has been taken away from us, from the IFQ's, the licensing, the fishing licensing that has been put upon us since the New England Fish Trap Companies. And it's a shame to me that our community has to be in such economic genocide, the state's turning around and telling us, "Oh, we give you a lot of money, we give you grants, we're granting you money." But, yet, no no, you could walk through this town and see how many people are unemployed or living off the welfare systems.

**Mr. Barlow:** You mention project home. I'm not familiar with that term. I've seen the homes—what is a project home?

**Ms. Frank:** They're 25 homes that are built exactly alike, all right straight in a row.

**Mr. Barlow:** Who are they built by?

**Ms. Frank:** They're built by the Federal Government and the State.

**Mr. Barlow:** I didn't know that.

**Ms. Schneider:** Those of you latecomers, I'd ask you, before you leave, not

necessarily now, we have a sign-in sheet there, if you'd make certain to get yourself on record. Are the three of you here to give testimony tonight?

**Ms. Frank:** I gave my testimony.

**Ms. Schneider:** Because people are kind of dropping it in. We're sort of taking it as you arrive.

**David Frisby:** Who are you guys?

**Ms. Schneider:** You want to make your introductions, Larry?

**Mr. Lunde:** Sure. What we're here for is for the Polk Inlet Environmental Impact Statement, which is for timber harvest over in the Polk Inlet area, close to here. My name is Larry Lunde, and I work over in Ketchikan in our planning department. And this is Gary Barlow who is representing the Craig Ranger District of Craig. Randy Fairbanks is project manager for Ebasco Environmental. We contracted with Ebasco to do the environmental study and produce the books that are up here. So they're the ones doing this project. My job is to sort of be the liaison between them and the Forest Service. We have Judy Schneider, who is public affairs and she's been in charge of the public involvement aspect of the project as well as the document production. Peter Carr, who is a public involvement specialist for Ebasco, and he's also taking care of the taping and those kind of things. We have Jack Lobdell who is a subcontractor for Ebasco that was doing a cultural resource study, and then he also did the baseline survey where folks came out and did some interviews, and they interviewed some folks here in this community two summers ago and basically what they were doing was looking at the TRUCS data that was done in '86 or '87 and trying to validate that in relation to the Polk Inlet Project Area.

**Mr. Frisby:** Who's here for subsistence?

**Mr. Lunde:** Jack is the person that pulled the analysis and the numbers together but basically we're all here to listen, from the subsistence aspect of it. Now, what we have here, we have some maps of the different alternatives, and you're welcome to look at those; if you have questions about those we can answer those. We have some of the documentation of the different resource reports up here that were used to develop the EIS.

**Mr. Frisby:** Are you Federal Government?

**Mr. Lunde:** Yes. U.S. Forest Service.

**Mr. Frisby:** Is that the Federal Government?

**Mr. Lunde:** Yes

**Mr. Frisby:** So you guys ain't State people.

**Mr. Lunde:** Pardon me? No.

**Mr. Barlow:** No, but we are here to take subsistence testimony for folks that are interested in giving input on the Polk Inlet EIS and the Environmental Impact Statement that we're referring to.

**Ms. Schneider:** It's ANILCA 810 testimony that we're taking—

**Mr. Frisby:** This summer I got caught fishing without a permit. I didn't get one. Subsistence permit. I don't have any money. I didn't have any money last summer to go down there and catch fish. They said, they asked me why I didn't get a permit, it's free. I thought because I'm a Native I don't think I need one. One boat goes up there and he makes a—he catches more fish than the whole town of Hydaburg. Then they say we can only take 20 fish at a time. Now I have to go to court and when I go to court, the lawyer told me to plead guilty and they'll fine me \$100. I don't have a \$100. So they're threatening to take it out of my permanent fund. If I plead guilty they'll fine me a hundred dollars and if I plead not guilty, they say they'll take five hundred dollars from my permanent fund. I don't think that's right. State Fish and Game. Besides that, they don't

have any idea how much fish comes out, I don't even think they have any idea how much fish comes out of Klawock Lake, because they don't enforce it. They come around when they feel like coming around and they give people tickets. I'm not going to pay no fine. What are you guys here for on subsistence? What do you think should be done about that?

**Mr. Lobdell:** The part of subsistence that we're here for is to take testimony on your feelings or ideas concerning subsistence and the Polk Inlet Project, which is Forest Service and Federal. The way that the Federal government considers subsistence is very different from the way that the State has, and I think that—I'm personally very sympathetic to your frustrations about this because of the changes in how subsistence has been treated in the state, just over the last 3 years. Each year it's changed and some years you didn't need a permit and some years you did. Some years there were no limitations and other years there were limitations on personal use. Some areas that were subsistence areas have been changed to personal use areas, and some areas that were subsistence areas are now called nonsubsistence areas, and no subsistence is permitted in those areas. So it's very frustrating I'm sure for you to keep up with things that you as a group of people have been doing for thousands of years.

**Mr. Frisby:** You think the Federal Government should take it over and tell the State what to do? Because when we got to go get fish eggs now we can't get any because the state of Alaska lets the big boats fish it out. They know what they're doing. And yet they let it happen. We have to go up to Craig to get fish eggs now.

**Mr. Lobdell:** The way that the most recent interpretation of the state jurisdiction reads is that subsistence users have priority over all other users.

**Mr. Frisby:** That's not true though.

**Mr. Lobdell:** The difficulty is making sure that you get heard, that your needs have not been met. And that's something that this project, because it's a separate project, can't do for you. But I guess that I would say that I'm sympathetic to the frustrations that you're under right now and would encourage you to talk to your corporation leaders and to your local leaders and to your elders and to your state government officials, especially in each case like your own. In your own case, the way that you said it to me, if I were a judge, I would think twice about a fine, I would think very hard about a permit. If a permit costs nothing, and it means nothing, why do you need a permit for example. I think I would personally, if I were a judge, take those things very heavily into consideration in your own personal case.

**Mr. Frisby:** Because if they put a sign up there on the door and ask people to say how much sockeye they caught this summer they would get exactly the same results as they get when they pass out these permits. It ain't going to change because what they do is say you could only catch 20 fish. Nobody's going to go by that no matter what they say. They have to change their—it's always been a saying around here that the up north people get more fish for their dogs, that's what everybody says. If you guys checked into it up there, I don't know that's just what I hear. But I don't think I should pay a \$100 fine and I don't think they should take my \$500 out of my permanent fund for that, because they're not making no effort to try to change things either. They're just kind of like dictating things that ain't going to change.

**Mr. Lobdell:** Well, over the past 3 years the law and the interpretation of the law has changed six times. And it's very difficult to track it, even if you live in Juneau, even if you're a subsistence researcher full time, it's very difficult to track it area by area. So, again, I'm sympathetic with the frustration that you feel, and certainly in your own case, since the law has not made itself in a 3-year period, that you have an opportunity here to make the law. With that opportunity, especially in your own case, I think that if you explain it to the judge the same way that you've explained it to me, however he rules, however he determines whether or not you get punished or you don't get punished, whether or not you pay a fine or don't pay a fine, is a very very important part of the development of how subsistence in all of the areas of Alaska, with all of Alaska's people, is going to be treated in the years to come. Because this most



recent change in the state subsistence laws is not going to be the last one. There's already pressure to change it again, in all of the areas. And if you feel strongly about the Kaigani-Haida area, then that's the area that you can best represent as the people of this community.

**Mr. Frisby:** I don't think it's right that we have to go up to Craig to get fish eggs. That's where my Dad was born, in Craig. He said when he was a boy there was so much fish eggs up there, he said what they call a lot that's just a trickle of what it used to be. That's how it was around here when I talk to some of these older people. They had fish eggs spawning up here in the bay, there was so much, and now that Fish and Game they let them fish it out and when people go look for fish eggs out there they can't find 'em. There's no more. The Fish and Game lets them fish it out. I think that's what's happening to the fish around here. You know they say they're (unintelligible). But what's happening is they have these gigantic fish hatcheries, where all these boats are catching the fish out here on the run through. They're catching hatchery fish. They're breaking records every year. That's probably mostly hatchery fish. What is happening is all these little streams around here each year they're getting less and less and these hatcheries are getting bigger and bigger. And the Fish and Game, I think as long as they're breaking records every year, that's good, the fisherman are making money. But what's happening is our fish around here are getting less and less. If the Fish and Game was serious, they would have people down here when the sockeye first come in. They come in here as good bunches and then as soon as they open the fishing season you find out there's no more fish because these boats are cleaning 'em off. And then as soon as they close down the season, towards the end this place here starts to fill up again. The boats are catching too much. It's all hatchery fish I think.

I think that's what the, maybe the government should check into it because the State, all they're worried about doing is producing more fish and that's what they're doing. You never know. I don't think they're going to check into it. Once in a while they have a Fish and Game come down here, maybe for a year or two, they don't come around and then they come down and issue tickets and stuff. I don't think they're serious about their job. I think they're serious about their jobs, they want it, that's good, it might be good in the way they do it. But I think we're getting the short end of it. I don't think we should have to get a license or a permit. It's just as easy, if they want to know, they could have people just put their names on and how much fish they caught they'd get the same results. Nobody's down there—they think people are going to go down there and catch as much fish as they could and sell it and stuff. Normally that's too much work for the average person. I can't go down and do that. There might be a few that might do it. Still it's a lot of work to do that. I think maybe the Fish and Game, their rules are too stiff maybe. Something. I'm not going to plead guilty. Cause I don't think I'm guilty. I never had a permit in any year before this last year. Fish and Game sent me a letter asking me how much fish I caught. I didn't even sign up for a permit. They did that to me the year before and the year before that. I didn't even sign up for a permit, how do they know who I am?

**Mr. Lunde:** Good question. The reason we're here is because we've got this area, this is Twelvemile Arm, Polk Inlet, Chomly Sound, West Arm down here, and Hydaburg's right down here. What we're doing, we're proposing to harvest timber and build more roads in this area, and we're going to be affecting wildlife habitat. We're going to be doing things that can change the access to the area. And maybe our activities could influence what the use patterns are in there. And because of that, and with the subsistence or the ANILCA laws, because of that, that's why we're holding this hearing or series of hearings, so that if the local folks in the area know of areas that are key in here or more important than others, you have an opportunity to tell us so it could maybe help influence, it could help us make the best decision of where we harvest or if we harvest and how much, and those kind of things. So that's the real purpose for us here, so that we could focus in on what's going on in the Project Area and hopefully make a better decision.

**Mr. Frisby:** One guy was trying to be a carver, to carve totem poles and stuff, and I talked to the Forest Service before, about 10,000 board feet they got. That's good, that part is good, but I think you guys should add on to that part where we have these, a lot of people outside here are starting to think too much

wood is being cut; that might be true. The old growth where you can get a nice big red cedar, that's the kind that some people are thinking you guys should let stand, for, somebody might want to make a big 50- or 60-foot canoe. One that was built here in (Massa?.....) a few years ago they said they had a log that was over 200 feet long to get a 50-foot canoe out of. It'd be pretty hard to find that kind of log around here. That's why some other people are thinking, they're cutting too much timber out. Cutting too many old growth down. Now, if I wanted to get one of those logs, Sealaska told me I'd have to pay for it, what they call it when you haul it out? You have to pay for it, charge to get it out. The Forest Service don't charge nothing like that. If there's a way that I could get a big log like that I could ask the Forest Service. But they only have certain places where you can get it. I don't see how come I can't get one from one of the logging stage where them guys cut it?

**Mr. Lunde:** You can.

**Mr. Frisby:** I couldn't. I think I asked 'em, they didn't know about that.

**Mr. Barlow:** You can. If it's Forest Service land, you can get 10,000 free board foot. Just let us know, and we'll work with you to take care of it.

**Mr. Frisby:** So if I wanted to get a good size log like that I could get a real nice one off the loggings or from wherever you guys dragged it, for nothing?

**Mr. Barlow:** And I know that we have been working Percy Nix and with other folks down here for canoes with some large red cedar out on Goat Island, to make some available. But, if you would like one too, there's no reason why we can't work with you to help you find a large red cedar that's acceptable to you.

**Mr. Frisby:** I'm kind of behind you, I got five logs over there to be cut up yet. I have one, about that big, over there. It's a hundred and twenty footer though. I was thinking of maybe getting a good size log like that would be a lot easier than dragging it out of the woods.

**Mr. Barlow:** What's your name?

**Mr. Frisby:** David Frisby

**Mr. Barlow:** Oh, okay, I recognize your name. Have you worked with Roy Clark?

**Mr. Frisby:** Yeah, I was pretty lucky, we picked nine logs over there and not a one of them had a check in it.

**Mr. Barlow:** Great.

**Mr. Frisby:** Must have been a lucky pick.

**Mr. Barlow:** That's great.

**Mr. Frisby:** We had a huge over 120 footer, I think 46 inches. A nice log, solid all the way through. Now, you get a log like that, I think I got to have one for these, see I want to do totem poles. I worked on a lot of little canoes, about 15 little ones, but I'd like to do totem poles, the bigger things. It'd be real nice to have a log maybe that's pretty even all the way up, 50 feet. You see loggers cut them at about forty feet. I like to start at about 50 feet. That's what I'm hoping to get in the next year or so.

**Mr. Barlow:** You can get, if its not in a—do you know what contract area for the logger is? As long as it's not right directly inside their contract area, if you have a log that particularly you want, and it's not right beside a large fishery stream because we're not allowed to go into that area, we have no problem permitting you take it.

**Mr. Frisby:** Well then I'll have to move it myself you know, is that what will happen?

**Mr. Barlow:** Yeah, unless you want me to come on my weekend and help you move it out.  
(Laughter)

**Mr. Frisby:** That's a big problem for us, you know, to move a log that size around.

**Mr. Barlow:** Local loggers around here sometimes have equipment that is free for a short period of time and they might be able to load it up for you and move it over for you. So you could talk to them, some of the folks that are here.

**Mr. Frisby:** What about that if I sign up for 10,000 board feet, if I don't finish getting it this year, then say in January I start it again. I can't get any more after I finish that 10,000 board feet? Like this year I had 6,000 board feet and I'm not done cutting it yet. And in January I can't get any more?

**Mr. Barlow:** Your permit expires at that time. If you want that same volume, if it's still standing, we will re-permit you for it. Say it's 4,000 board feet that's still standing, then we would give you an additional 6,000 board to make 10,000 board feet because you get 10,000 board feet annually. That's a lot of wood. That's almost more than most—one 10,000-board-foot tree generally builds a three-bedroom home. So it's a tremendous amount of wood.

**Mr. Frisby:** Them guys, when they measure after 40 feet, the knots on them are that big.

**Mr. Barlow:** You pick the tree. You pick the one you want.

**Ms. Schneider:** I wonder if maybe we should take the rest of the testimony. Perhaps, if you two want to discuss this after the meeting you could do that.

**Mr. Fairbanks:** Did you want to give some testimony on the Polk Inlet project?

**Mr. Frisby:** I hope you guys don't cut them all down. I don't think that—because there's thousands of people screaming, all the scientists are saying, quit logging, all the rain forests are gone. And it seems like the National Forest is just getting cut up pretty fast. I don't know whatever happens on that part, I don't know nothing about that but they might know.

**Ms. Frank:** I've given mine.

**Speaker:** I'll say something

**Ms. Schneider:** Could you state your name before you give your statement and spell it for us please.

THYD-3

**Vicki LeCornu:** My name is Vicki LeCornu (spelled). It took me so long to read this thing I had to really spend a lot of time and I think that's very overburdening for a lot of people to come out with all the right issues, and you know it's bad for the forest generally. But to focus on these issues, it took a lot of work, but I kind of found the issues that you focused on. The economic efficiency: It doesn't work for Hydaburg, there are no employment opportunities for Hydaburg. Strike that. It doesn't benefit us but it depreciates the capital on Haida country, traditional and customary boundaries. It depletes my capital. It might be cost effective for your society, but it depletes my capital. Our ability to carry on as the Haida tribe they destroy the resources wholesale, so that negatively affects community stability, which is also an issue. We're displaced by other users, that adversely affects us. No economic benefit for Hydaburg. The adverse effects outweigh any benefit that might come our way in the way of \$26,000 for a road which is what we got last year I think, or, \$50,000 for a school. Those benefits don't add up to the adverse effects that we'll suffer by lack of access and denied resources by removing the resources, the wild and renewable resources. It results in a taking, by the U.S. Forest Service, of property. The same agency in charge of my subsistence rights is taking my subsistence rights by restricting them.

THYD-3 Comment noted.

THYD-4

The significant restriction, by affecting my livelihood, substantial reduction in opportunity, reduction in abundance or redistribution of resources, substantial

THYD-4 Comment noted.



**THYD-4  
(cont.)**

interference with access or major increases in the use of those resources by nonrural residents. And I think Joe mentioned that when those trees are gone we won't have no trees for canoes. We will have no trees for totem poles. We will have no trees for cedar bark. And I know Polk Inlet is a real important area for cedar bark gathering and maybe spruce root gathering. Maybe gray currants as was mentioned as the use some 50 years ago.

So I believe it restricts my use of the area. And the book did state on one page that it was hunting only, and I didn't understand why they would just mention hunting because it is like we mentioned other nonrenewable resources, or I believe it's all resources, and so I take offense to those categories, too, I guess. So, who has decided those needs and uses; those haven't been determined by anybody I know in this community.

**THYD-5**

So we in Hydaburg pay the high price of logging for Ketchikan employment. And there was also irreversible commitments affecting nonrenewable resources such as soils, wetlands, unroaded areas, and cultural resources. But I think that they're all nonrenewable because once they're gone, they're gone. They're down the chute or wherever. They're not renewable and they're not sustainable in those regards. In our society we would have a more sustainable economy. And those needs or uses were not addressed or met or anything.

The cultural resources in that area have already been pretty much destroyed I think by previous logging. I don't know, I haven't been there, I haven't looked, but I do know that the historical use that's been there, of the Haidas and that the stories of their first move into the country is right here in Chomly Sound and probably everywhere north, up past Polk Inlet to the Klawock River. Yeah, everything's destroyed, the wetlands, all those nonrenewable resources. And like I said I don't think my uses of the forest should be restricted to just those resources that you see important for me. If I want to go out and enjoy it I think it should be there for me and the rest of the country. So that's my—I think that's it. Thanks.

**Ms. Schneider:** Thank you.

**Adrian LeCornu:** My name's Adrian LeCornu. I'm also a resident here in Hydaburg. I'd like to talk about the subsistence view generally and about the issue of, well, let's just talk about subsistence generally. And that's like what Joe was saying, or David, was saying earlier, that a fishing permit was not required and that might shock some to think that, gee that's strange. When an Indian person from Southeast Alaska looks at other Indians throughout the United States, then when we look at subsistence, and you look at hunting and fishing rights in the lower 48, say, it's like, just because you're finding kittens in the oven doesn't make them biscuits. That's the same way with fishing rights.

The idea that—I just brought some history notes that I had from things I've been collecting. On April 4th, 1882, Reverend John Loomis Gould writes to Sheldon Jackson from Wrangell: "A good report comes to us from the Haidas. I have seen two of them. They are fine stalwart fellows. I do not think Alaskans are Indians." So this idea that suddenly Indians aren't Indians, I think it comes from an earlier period when Father Duncan was thinking about establishing a mission for the Tsimshians and—I tried to put these things together but I didn't have a whole lot of time, so excuse me for taking up a little bit—so.

**Mr. Lunde:** We've got plenty of time. Don't worry about that.

**Mr. LeCornu:** OK. In the spring of 1860, Father Duncan made his first trip back to Victoria. He'd gotten up to Fort Simpson in October of 1857, so he'd been there almost two and a half years or so. He had been asked by Governor Douglas to work for a time with the Indians in their camps. The governor also wanted Duncan's suggestion on how the governor might assist his work with the Tsimshians at Fort Simpson. Duncan told Douglas, he wanted to find a home for the Indians where they may be provided employment. "I confess my only hope of seeing the Indian races of this coast diverted from the destructive courses to which they are now so strongly tempted, lies in carrying out some such plan. However small and insignificant at first such a place might be, I have no doubt of its ultimate growth and prosperity."

**THYD-5** Comment noted.

So that was the plan for Metlakatla. And a similar idea came across with Captain Pratt in the Carlisle Institute in the lower 48, "to kill the Indian and save the man." So this concept of developing a separation of the Indian from his culture and take him away from who he was, is something that has been occurring for some time. In 1895, Sheldon Jackson gave a speech before the Lake Mohonk Conference of Indian Commissioners, and this is on October 9, 1895, Sheldon Jackson says, "I come to represent Alaska. We have no Indians in Alaska. We have Natives. When Alaska began to be developed, some wise men said, what are you going to do with the Natives? Do you want reservations? The answer was no. Do you want agents? No. Do you want those people to be sheltered behind the Indian policies of the government? No. We want citizenship from the start, and that the people should simply be called Natives. It was at first a constant fight to keep from being called Indians. We wanted to commence where the friends of the Indians left off. We wanted to avail ourselves of the experiences of the past on the Indian question, and as we have no Indians, we have only Natives. The Natives have all the rights that any white man has. There has never been a time since the establishment of courts in that land when a native could not sue or be sued like any white man."

So I think that was a little bit of rhetoric there on his part, but overall this concept of separating the Indians from his own identity as—you know, nobody likes to be called Indians down south because that's a misnomer to begin with. But the idea of being an aboriginal group and entitled to certain rights and protections as a nation or a group of people with an identity has been recognized throughout the world, and more and more people look in terms of the international sphere. But in the early years, going back to the Monroe Doctrine in 1823, the Monroe Doctrine had everything to do with this area, because in 1821 the Russians passed a regulation saying that they forbid any foreign power from fishing or trading with Indians south— Well, I think they just arbitrarily picked the "54-40 or fight".

So, the Monroe Doctrine was related to the theory that says on the one hand it was related to the controversy between Russia and the United States over the northwest coast of America. In February of 1823 the Russian government issued a regulation forbidding foreign ships from approaching within 100 miles of shore. And, "The government of the United States has been desirous by this friendly proceedings with manifesting the great value which they invariably attach to the friendship of Russia, of the Emperor, and their solicitude to cultivate the best understanding with his government. In the discussion to which this interest has given rise, and in the arrangements by which they may terminate, the occasion has been judged proper for asserting as a principle in which the rights and interests of the United States are involved but the American continent, by the free and independent condition which they assume and maintain are henceforth not to be considered subjects of future colonization by any European powers."

And so in 1825 they created this boundary which effectively divided the Haida homeland arbitrarily at 54/40, and everybody knows James K. Polk's run for President it was a big thing, "54/40 or Fight." Right. I guess what I'm saying about this is that all these things have been items of issue for people in dealing with the resources of this area, and with total disregard of the people who resided in here. And, to my mind that continues to this day. I mean we've testified before and it seems like its for naught. And, it doesn't make any difference; I think we'll probably have to continue, and people—this is a fragile society, because we're a small group of people, and there's a lot of resources that are of value to most anybody who cares to look at 'em. It's difficult for somebody like us to maintain sovereign control over this area without any assistance from the government. And at one time the United States was telling the Haidas that they would maintain this protection and separate them from any harm that might be caused by people seeking resources and development.

We can go forward and backwards in the history, and I think part of it would be a useful exercise but then other parts of it might not be. So, I think the things that are important to this community is its future as a Native Haida community. I think that this is a homeland. This gave the foundation and impetus to the Alaska Claims Settlement Act, to the Tlingit and Haida Jurisdictional Claims Settlement, through the claim. The Haidas had represented themselves in every one of them processes seeking to be self governed. In 1938 they created the IRA



here in Hydaburg. It was the first IRA in Alaska. Their immediate action was to propose an area around Hydaburg sufficient to maintain them in economic sufficiency into the future. So from 1938 to 1952, they went through a process that they had hoped would resolve for some time this issue of what was Haida country. In 1952 the U.S. District Court Judge Folta, who in his capacity as Solicitor for the Department of the Interior, acted as the advocate for the Reservation—I'll read you a part of his opinion; I think that it's enlightening. So that the case that I'm talking about is the United States vs. Libby McNeil Libby, and the ruling was issued on October 7, 1952. And this is just a part of it, so I'm taking them out of context.

"At least since the discovery of gold in the Klondike, Congress has encouraged settlement and development of Alaska, and since World War II the importance of increased populations in national defense has been stressed repeatedly in Congress, in military circles, and via administration spokesmen. In the ensuing fifty-four years, the Indians of Southeast Alaska, and particularly the Haidas, have not only abandoned their primitive ways and adopted the ways of civilized life, but are now fully capable of competing with the whites in every field of endeavor. Undoubtedly in the early days, their rights were encroached upon and violated, for which perhaps no compensation would have been adequate. Now, long after their assimilation in Southeast Alaska is an accomplished fact, an attempt is made to compensate, not those who suffered under the impact of civilization, but their remote descendants. And this would be done at the expense of the whites who followed and who had nothing to do with the exploitation of the Indians. In a matter of common knowledge that today the Indians of Southeast prefer the white man's life despite all its evils and shortcomings. Viewing this controversy in a historical perspective, it is no exaggeration to say that nothing since the purchase of Alaska has engendered so much ill feeling and resentment as the department's reservation policy and its encouragement of aboriginal claims, especially in the face of *Miller vs. United States*, holding that the aboriginal title was extinguished by the treaty as session. Whatever may be said in justification of the reservations in the unsettled regions of Alaska, they are viewed as indefensible in Southeastern Alaska and generally condemned by Indians and Whites alike as racial segregation and discrimination in their worst form. So as far as relations between whites and Indians are concerned, racial discrimination is virtually nonexistent and equality only awaits the emancipation of the Indians from the wardship restrictions."

Well, that gives you an idea, but in 1944 this was the advocate (George Folta), the zealous advocate that we had, defending our interests during this administrative adjudication of our aboriginal rights. So, this community has gone through a lot of things and it's not difficult to see why it's so frustrating for local people to take either the state or the Federal government seriously with respect to anything that might relate to a benefit for them. Because it hasn't been. If you compute all the wealth that's taken out of Haida country, and there are boundaries for what is designated as Haida country in the archives of the United States and in the hearing records for the various court cases and administrative procedures, so it's no mystery what area I'm talking about. And within that area is Polk Inlet. You compute the values of what has come down out of that country. And you compare that to what has been offered to these people in the way of meaningful employment, in the way of assistance in the educational system, in every way. And you'll see the minuscule amounts that have been expended, are largely squandered, in administrative ways, and it's not getting to people. These processes that we go through over and over again are just an exercise. I think the government recognizes that this is a fragile society with few individuals who, from a blood quantum point of view, will eventually evaporate. But that's not necessarily true. There's this whole idea of aboriginal rights and claims and this idea of membership and tribal organizations is political, and it has nothing to do with race. That's what we're told over and over again. So what does that mean for us?

**Mr. Frisby:** I talked to a guy, Adrian. He was up here this summer. He was telling me the Natives down south, he said that the government don't recognize them no more because too many white people married in with them. He said they been fighting for years now and the government refuses to recognize them, because—he's a white guy. He's going to college. He



graduated. He's supposed to be a real smart guy. And he told me the government don't recognize those Natives down there no more because of the intermarriages. Is that what the government is going for?

**Mr. LeCornu:** Yeah, because you know you go back to the idea of what Teddy Roosevelt said is pulverizing the tribal mass, the idea that okay, my quotable quote. In 1879 the British fought a battle in South Africa with the Zulus. They called them the battle of Ulundi. Might be related. (Laughter). The British forces defeat the Zulus at Ulundi King Ceteswayo's capital, and this was the end of the Zulu war. And the chief effect of the war for the British was the new conviction that they had to rule their colonial possessions with more resolution than ever before and that the ways of the natives could not be tolerated. The idea that this policy that was implemented in Africa has no basis in the United States or North America is hogwash, because they were under the colonial regime of the British Empire and the policies were dictated directly out of Victoria and Vancouver. The association between this area and Vancouver and Victoria was very close. In fact that was the cause of the smallpox epidemic for the Haidas, was that relationship. The idea that we got to get rid of the "tribe," you know that was the reason for in 1871 to quit dealing with tribes in the United States. March 3, 1871, they quit making treaties with Indian tribes. That was about the same time that they were becoming conscious of these different activities that went on in Europe and Africa. They learned how to treat their colonial brethren when they got together in 1886—the Berlin conference—to discuss the partitioning of Africa. And the idea of what these tribes meant, that you got to get rid of them.

THYD-6

I don't know, I don't want to spend all this time because I don't really think it's going to be a totally productive effort because I think that we have difficulty learning about ourselves and it's surely something that's doubly difficult for somebody that just doesn't care, that have no interest here. "I have no reason to learn these things about you people." And that makes it doubly difficult. But I think this issue that we have here with having to deal with a tremendous amount of information compressed into 10 pounds of books or whatever it is—for an average citizen it's really difficult. If the Forest Service wanted to improve on this sterile 810 process, is to get involved early on the process with the tribes. But it's like the chicken with the eggs, we have trouble with our tribe now of getting together at all. But if we had some reason to get together and say, hey, we're doing to this Polk Inlet sale, we really want to get with you guys. These are tribal issues that are of paramount importance to the future of this island. That if we don't deal with these issues on a sustainable basis, our children and our grandchildren won't have a homeland that is habitable. And it'll certainly be difficult to earn a living in the contemporary economy. So it just seems to me that the democratic process is a good one, but when you do it just simply to build a record and not really—we're dealing with the inertia of the Federal Government, which they wouldn't even feel a bump if they rolled over us. They wouldn't. I think we found that out when we went to Washington D.C. for the Haida Corporation Land Exchange. Some of the delegations for some of these organizations were as large as this entire town. So it's just hard to get over the roar? to say hey, this community is near the brink, and if we can't pull together and if we can't work with these partner groups on this island for the future of this island, well, let's call it the region and try to do something to turn around this idea that we can take a public resource and turn it over through private industry and pretty soon we've created a monster if you ask me. And that's these pulp mills and these long term timber contracts—they never learned anything from the Reed brothers suit. They never learned anything from anything. And originally those long term contracts were to benefit these local communities and to encourage them to be independently involved in the timber industry or any other related field. And the way they turned out, they became a monster and they're just swallowing up these communities because they had no need for them. If anything, we put pressure on their timber supply, and that's the only thing they want to hear about—or not. And if you want to personify the sawmills or long-term contracts I don't know what it would look like. I'm not blaming the individual people who are involved; that's a part of some people's culture to participate. But some people are trying to figure out what the future might bring.

In 1898 Governor Brady come to talk to the Tlingit people up near Auk Bay, and one of them was asking—the guy he says, the canoe rocks and we don't know what will become of us. And I think that's the same thing that we feel here. That somebody's rocking the canoe and it's not very comfortable. That's all I got to say.

THYD-6 Comment noted. See Response TSAX-3.

**Mr. Lunde:** That was good.

**Ms. Schneider:** Thank you. Do you have a statement that you'd like to make?

**Mr. Burgess:** No, I'm statemented out, to tell you the truth. I made a very what I considered a comprehensive statement here a couple years ago. And basically, even the material you are working with has never been recognized in any Native community TRUCS as being accurate or, not only that, it wasn't consistent with the intent of Title 8 of the ANILCA and everybody recognizes what's wrong. It's the United States of America. It's way off the track is what they are. And then again, you know you hear the congressmen and the senators, like I heard Don Young this afternoon. Believe it or not he was blaming you guys for the problem, the bureaucrats. It was quite clear who he's blaming. And you know, if Congress can't do anything about the system, why there isn't a hell of a lot that we can do. Both Adrian and I have been going through this process with different agencies for quite a few years, and it's gotten us nowhere except on the record. That's about it.

**Mr. LeCornu:** I'm going to keep on going.

**Mr. Burgess:** Adrian'll keep it up.

**Ms. Schneider:** For the record, may I have your name.

**Mr. Burgess:** Victor Burgess.

**Mr. Lunde:** It's probably foolish of me to say so, but I would continue to say, don't give up.

**Mr. Burgess:** Well I've got nothing better to do so —

**Mr. Lunde:** Seriously—

**Mr. Burgess:** I am serious, too.

**Ms. Frank:** I think we're all serious here. Don't give up.

**Mr. Frisby:** How come the Forest Service loses so much money when they do so much logging? When a tiny little corporation could make a lot of money and give a huge amount of money? Why can't the National Forest Service make a huger amount of money with all the logging they're doing?

**Mr. Lunde:** The biggest difference economically is that we restrict exporting off the National Forest land. So on the Native Corporation lands or on private land, where we don't have export restrictions, you can play a larger market and get a lot more money for your logs. Whereas on the National Forest land they have to be processed domestically and then shipped as a product. The primary reason for that is so that there'll be some manufacturing done at home; therefore, the job creation and so forth, rather than just be a money-maker.

**Mr. Frisby:** They always talk about second growth trees, how come I hear a lot of people say they're no good?

**Mr. Lunde:** Well, the second growth grows, generally it will grow at a faster rate and so the density of the wood will be a little less. It won't be as dense, therefore it may not have the same strength factors and whatnot. But I heard, I came from the Pacific Northwest and I heard people say that quite a few years ago, but then as the second growth stuff came on line and started becoming large enough and old enough to harvest again, actually the markets adjusted to it and those are very valuable woods, and then they had other products that came out of those as well. If you compare the old-growth wood that we're marketing and processing wood, it has properties that are good for the products that they're making out of it. Well, the second growth coming on, that grows maybe only 100 years instead of 200 years like the old growth, won't have those same properties. So if you compare them, they are going to be different. But you are producing good wood, it's just that the use will probably be a little different.

**Mr. Frisby:** How come —

**Mr. Lunde:** It would be like your canoe wood, you probably wouldn't go out and choose probably a young tree out there. You'd go look for a bigger one because it has, not only the size, it has different properties in it. A lot of the life in that tree, it probably grew slower and the wood's better. Whereas that young tree's going to need a hundred years or something before it will be one you'd want. It's that same type of thing.

**Mr. Frisby:** How come the Forest Service don't start to select logging so they can leave some of the old growth standing? Why can't they do that?

**Mr. Lunde:** We're looking more and more at doing some of that. I think that what has been driving us with the way we've harvested, we're looking at economic efficiency. When you do clearcut, then it's a lot more efficient to just pull everything up and take the good stuff and run away. We've had problems here when you do leave wood out there you have blowdown and stuff like that. If it does blow down, then you either need to just leave it there, or rig back up and go back and get it and all that costs more money. So it's been purely economic efficiency. And the fact that the young trees come back like weeds when you do clearcut.

**Mr. Frisby:** They grow fast.

**Mr. Lunde:** So that those two things alone have indicated that from a pure timber management standpoint, that's been the best way to do business.

**Mr. Frisby:** But that's totally destroying the landmark trees, it's always a lower grade, no matter what happens. You can't get the same price for a good tree as far as second growth—

**Unidentified Speaker:** Why not, Joe?

**Mr. Frisby:** —because the grade is lower. He's already said it. It's the price tag you guys are placing on the trees.

**Mr. Lunde:** The price tag with the markets you have here in Southeast, that's true. What we're doing is growing that fiber in that second growth and when we look at what it'll be when its age 100 or 150, all anticipations are that it will be good marketable wood at that time. Certainly it won't be old growth, and I think that's probably the key difference. What we're looking at today, we're harvesting old growth that has a lot of denser wood and it can be used more easily for different products than what this second growth when it matures will be. You've got—you go down to the north end of Prince of Wales Island, where, and I'm sure there're probably stands like that around here—you'll have old growth but it's pretty dense and a lot of trees in there and it's pretty closed canopy, and those are really older second-growth, natural second-growth stands. They have a very high volume and they produce good wood; those up there I think in the north end are probably around 150 years old.

**Mr. Frisby:** I think that the Forest Service is going to do what they want to do. I think like Adrian said, it's not going to change. What I think you guys should do is bend a little maybe for fifty miles around this area and you guys should select logs and leave some of the good cedar standing.

**Mr. Barlow:** Do you know what select logging is?

**Mr. Frisby:** Yes, you cut down the good trees, whatever you want. And then you leave the rest.

**Mr. Lunde:** Leave some standing. We are looking at doing a lot more of that. And I think you'll hear people talk about ecosystem management...

**Mr. Barlow:** Larry, he's talking about high grading.

**Mr. Lunde:** I understand that—that we will be leaving a lot more material in harvest units, and how good those trees will be for certain products when the next generation of trees come up we're not really sure about that. Each one of the



harvest units that are proposed in here, we're proposing to leave at least some level of stuff in those units, and some we're proposing to do some select logging like you were talking about, like in some of the helicopter areas, taking the more valuable stuff out but leaving as much of the other stuff in there as we can. We're trying to look at leaving more components in those places where we do go.

**Mr. Frisby:** The cedar log has no value to it, it has no price on it. They shouldn't even—they should leave a lot of those, because sooner or later the people around here are going to start to see what a Haida could carve . . . (tape over—brief interruption)

**Mr. Frisby:** I think everybody should have a totem pole in front of their house. It's going to be like that someday. It should be like that now.

**Ms. Frank:** But not only that, they should leave all our trees. Because as a weaver we use the spruce roots. As for tanning hides you could use the hemlock bark. And as for the cedar bark we could build our homes. Make all our mats, cedar mats. Regalia.

**Mr. Frisby:** I don't think we should be living in this T&H house. We should be living in the kind of house our ancestors lived in. I believe that was the best house made, even over this building here. Because of the way it was made and the carving that was on it. That's why you guys should leave a lot of the cedar for the people. They say the corporations should be doing that, but you guys, the Forest Service, has most of the land. The corporation's out there to make money. Sooner or later they might break. That's the business world. And when that happens everybody'll be around to sue you guys again.

**Mr. Lunde:** One of the things that we'll be able to do with things that we hear tonight and with the other subsistence hearings is not just taking the testimony, but what we'll be doing is looking at things that we can incorporate into the design of these sales. And one of the things that we can look at as we go back and start putting a final plan together is, we can look at the cedar or we can look at those kind of things and at least ask ourselves, what's going on, where's it located out there, and are there things that we can do to keep those options open for the future. And the cedar is a good example of that. And maybe we can do some assessment with the information that we gather when we do go out there on the ground. So I'm not going to make a promise to you but what we'll do we'll at least go back and look at it, and like I say, try to keep some of those options open for the future. Now I'm talking from a standpoint, I'm assuming we're going to ahead and have a decision to do something, and I'd be lying to you if I said that wasn't the case; but, at the same time if there are things that we can do in there, and recognize key areas or key pieces and try to keep those options open for the future, we'll try to do that.

**Mr. Frisby:** It would be good you know because sooner or later the people around here are going to want it. Maybe not for a while but they're going to want it.

**Mr. Fairbanks:** Is it red cedar or yellow cedar?

**Mr. Frisby:** Red cedar.

**Mr. Barlow:** What we could do is, if you have particular areas, and I know you consider the whole area as your own, but if you have specific areas that are really important to you, to identify those in this paperwork and send it in. I think that would have a real big impact in what determination is made. If you have areas where you're collecting cedar bark, that you want totem poles from, or different information, be sure you put down on paper and tell them where it is. I think they'd really work hard to protect those areas.

**Mr. Frisby:** My aunt is 84 and she told me where to get cedar bark, and where she told me, the Forest Service already logged that area. She said when she was eight years old she went out to public school and she said before she left her grandma was telling her she went out to get spruce roots, and right in that area, about some 75 years ago. Since then, the Forest Service about

logged it off. I don't have to go out there, I've been out there many times. But when she told me where I can get it I knew it was already logged off.

**Ms. LeCornu:** Where was that?

**Mr. Frisby:** In Natzuhini. It's logged off. Those little things were important a long time ago.

**Ms. LeCornu:** Well that's what I was saying, there was a trail from Natzuhini to Twelvemile. We'll probably never see it.

**Mr. Barlow:** I want to ask you, I was curious as to how you gain access to Polk and some of these other areas, whether you travel by water or travel by trail or what, prior to roads being available.

**Ms. LeCornu:** How did they travel? They had trails. That will never be known now because of the damage.

**Mr. Barlow:** That's really interesting because—that's a long ways to go. Or it would be for me.

**Ms. LeCornu:** If you had Haida people living on the other side of the Island, you'd get to them somehow. And, they had trade areas, and cedar bark was traded essentially.

**Mr. Burgess:** Those were essentially right-of-ways, I wonder that's probably the only thing you have a legal standing to sue for. Everything else is gone, but the right-of-ways, the original right-of-ways. Lately I should think that you still possess them.

**Mr. Frisby:** When they signed the lands claim, a lot of people around here think some of the people that were sent down there to negotiate for the Haidas, they sold the Haidas out. They weren't supposed to say what they were supposed to say. They kind of went along with the big government and sold us out.

**Mr. Barlow:** Were those the—twelve people that you were talking about?

**Ms. Frank:** That's historical documentation.

**Mr. Barlow:** Is that what we're talking about here?

**Ms. Frank:** Under the Alaska Native Claims Settlement Act. There was a few people that signed, that signed, yeah.

**Ms. LeCornu:** Yeah you can't sell—that's what these protections are supposed to offer, the things that were inalienable, and that's the right to use and occupy the area.

**Mr. LeCornu:** And that's confusing with the subsistence thing too, that according to the Boldt decision—well, these are collections of decisions—it says, "Indians cannot be barred from their usual and accustomed places." That's U.S. vs. Winans in 1905. "Indians have an easement over private as well as public to gain access to fish and to fish these areas." That's Winans? again, 1905. "Indians' usual and accustomed fishing places may be either on or beyond the territory seated by the tribe in its treaty with the United States." Seurfert Brothers vs. the United States. "The Indian rights to fish at those locations is a non-exclusive one that must be shared with non-Indians." That's the Puyallup Tribe vs. The Department of Game, 1968. "The Indians do not need to purchase a state fishing license when exercising their treaty fishing rights." I think this is the one that Joe has got caught into. Because under the SoHappy case in 1969, SoHappy got a ruling out of the 9th Circuit Court to say that where the State has the right to regulate the fishing of its citizens, where the fishing rights of Indians are concerned, the only opportunity the State has to exercise sovereignty over those actions would be because of conservation; I think they say that here that, "Indians can be regulated by States when necessary for conservation." That's the Puyallup Tribe vs. the Department of Game. And then the Supreme Court in U.S. vs. Washington, they construed this principle to mean that "the State may interfere with the Indians' fishing rights when necessary to prevent the destruction of a run of a particular species and a particular stream. Direct regulation of treaty Indian

fishing rights in the interest of conservation is permissible, only after the State has proved unable to preserve a run by forbidding the catch of fish by other citizens." And this is why it's so similar to the 805 strictures in ANILCA.

That's why it's such a difficulty to say, "you're an Indian but you're blind to these things because these apply down south, they don't apply to you; you're under the sufferance of ANILCA." And true or not, I think the issues have never been clarified or even discussed, either locally or—it's like that quotation, "The government is best which teaches its citizens how to govern." The government makes no effort to teach its citizens what their rights are or to exercise those rights. That's why we have many more people like David there that suffer from the arbitrary and capricious arm of the Department of Fish and Game. People are always anxious to look at Hydaburg and say that it's got a bad name and you guys are—the State would like to put us out of our misery.

But they never look at the arbitrary nature of what it is. It's just like that judge was saying, that the impacts of civilization were long ago. No, those impacts just now occurred. These people were never restricted in their rights to the use of this area up until recently, very recently. And I think most people in this community could vouch for that, that they were not—there was no taking, the taking was right here on paper. The actual taking is these sales. That will effectively eliminate our future interest. I mean, you know, we won't worry about these areas no more, what good do we have there? And look at Long Island, which is part of the Claim Settlement Act, but just as capricious to the eyes of the Haidas to give the most valuable tree stand in all of Haida country to a Tlingit community that lives 800 miles north or 400 miles or 300 or whatever it is, and say, well, if that's not a slap in the face. And to have the extent of suffering that we have locally from all—it's a deprivation for a lot of people, a deprivation of opportunity. It's a shame to see people go through this and to expect them to take these actions of this upright citizenship that's required of them, and then leave them off—they don't even give you enough opportunity to make a livelihood. But yet, this is the richest area in all of the Southeast, and that's evidenced in the selections of the Native corporations in this area.

**Ms. Frank:** Not only the Native corporations, but the United States Forest Service.

**Mr. LeCornu:** I think the people here have traded off—nobody challenges a Rockefeller or a Carnegie or a Rothschild to their inheritance. They got it made. You get a bunch of Indians and say, you have an inheritance, well no, not by any stretch of the imagination—you have to be an Indian first. And you guys are NATIVES, or you guys—They bring in through all these rigamaroles and then at the end they say, well, we're going to take it anyway because we have sovereign rights and you guys got sovereign—whatever you guys want to call it.

**Ms. Frank:** Regulations and policies and guidelines that you haven't followed by, and you are ignorant to.

**Mr. LeCornu:** Yeah, and then you want to make a difference, well get yourself a jet plane or something.

**Mr. Frisby:** Adrian, if you guys are serious about this, you guys should go back to where you came from and think about getting a—the Haidas never sold the land, I don't see how the government or anybody else got it. We were always here.

**Ms. LeCornu:** Adverse position

**Mr. Frisby:** I think you should think seriously about going back and talking about getting us more of our land back. If you look at how much land the Haida Corporation got on there, and ask a lot people how many of them signed up for at large, there's quite a few of them. See, we're considered landless, I'm considered a landless man because I signed up for at large at Sealaska. Why should I be considered landless when all this land here is supposed to be considered Haida land. You see the government set this thing up. I think you guys should go back and think seriously about turning a lot more of this land back over to us.



**Mr. Burgess:** It doesn't work because the land was gained through the Doctrine of Discovery, to acquire, to use the Doctrine of Discovery they had declared the Indians uncivilized. They made it uncivilized so therefore they could take the land out of the European Doctrine of Discovery.

**Mr. Frisby:** This should be a new time where we're not—fifty years ago our people didn't know what was going on when all this land was being taken away from them. You guys know and understand what it means now. I think that you guys should go back and think seriously about turning over at least half of what was considered Haida land. I'm sure a lot of people would be happy with it.

**Ms. LeCornu:** Well, Joe, when you ask, when you say you want to ask for it—we never relinquished any of it. We never did. So when you say you ask for it, that's the wrong approach. We never gave it up. We never gave it up. We never gave it up. We never gave it up.

**Mr. Frisby:** These people here, they know. I think you should go back to Washington and think about it. Because we have just as much right as you guys, and I don't see how the other people came in and took it over. If you guys don't want to take it over maybe you should quit logging and make the roads and make it a historical site or something because it was never the United States Government's and they didn't have no right taking it. And you guys are log it out. But, I don't think you guys should do it. I think you guys should turn it over. Maybe if you don't want to turn it over at least consider it Haida land or something instead of destroying it like they say. Because that guy that was up here, he was an anthropologist, and he told me no matter what the Indians do, the government is not going to turn it back. He said maybe we should fight for little things at a time like Kegoneke (?). That's what he told me. I told him I don't think that's right either. I think if you guys are serious about doing this thing, I think you guys should go back and reconsider what you guys are doing, or else turn over some the land. Because I don't think I should be considered landless, when so much of this land is supposed to be Haida land. I don't think what happened in 1971 is I took a place from a consulate. He told me to sign up for Sealaska at large. I didn't know what I was signing for. I probably still don't understand what it is.

**Mr. LeCornu:** I think that's the deal, too, about the Alaska Claims Settlement Act. They were drawing a treaty substitute because supposedly we agreed to it. But how was it agreed to? There was never a plebiscite, to have a vote of the people. In 187—I can give you a little history again, in 1879 Chief Joseph had this article written in the North American Review about his situation, and he says, "Suppose a white man should come up to me and say, 'Joseph, I like your horses, I want to buy them.'" And Joseph says, "No, I don't want to sell them, they suit me fine." So he goes down the road and he sees Joseph's neighbor and he says, "I talked to Joseph. I like his horses and I want to buy them but he won't sell them to me." And his neighbor says, "Well, pay me the money and you can have Joseph's horses." He says, if that's the way he lost his land, that's the way it happened. And that's the way a lot of people in this community feel, that they were never asked. That we deferred to our esteemed leadership, but it wasn't even that; I think it was a very similar situation to what happened in Hawaii in 1893 when what was her name, Liliuokalani was overtaken by some anxious plantation owners. But in 1958 or 1959, December 12, 1959, the United States adopts General Assembly Resolution 1469 that said that "Alaska had effectively exercised the right of self-determination and freely chosen their present status as a state in the United States." And that was part of a process that was supposedly to allow the indigenous people of Alaska to vote on whether to go with the United States or to go independently as their sovereign indigenous tribes might choose to go. In the election for the State everybody says, you participated, but we participated in a diluted vote. It wasn't open to them. So I think that a very similar parallel could be drawn between us and Hawaii. I don't know. It doesn't make any difference. The truth never makes any difference too much to Machiavellians.

There's nothing wrong with being a Machiavellian, I'm not saying that. I just think that some people ought to be more humane in their treatment of people, and a little bit more understanding of where they come and their response to circumstances which they surely didn't create. I think that's an idea for this economic development—that people see these things like alcoholism, drug abuse,

child abuse—see these things as aberrations and the individual is completely culpable all by himself. But I think, like many other people think, that alcoholism and child abuse and those things are symptoms of a larger wrong, really. That it's hard to get yourself out of a circle like that. We would think that the United States would have an obligation to provide us with some assistance, but if you read any of the court cases with regard to the Trust responsibility, the government usually withdraws their willingness for various and numerous reasons. But I think that's something that the international communities should look into—I mean, it bodes well for everybody. You see people that are displaced elsewhere by encroaching populations. It's a terrible thing to go through. I think that the problems the United States has in its interpretation of what its citizens' rights are with respect to "plug in and plug out, throw away communities" and things like that are a thing of the past. I think that the world is just too damn big to have a mobile population that just uproots wherever they go and continues on the path. This was once the furthest ends of the earth, if you look at the trader logs of Vancouver and Cook, this was the very ends of the earth up there. And you look at it now, we're not. Slowly it's going to turn around and bite somebody. Things fall apart, all that is solid melts into air, and all that kind of stuff. Shit happens. That's really what's coming down the pike.

We have to reassess ourselves as Indian people just as you have to reassess yourselves as citizens of the state or whatever.

**Mr. Barlow:** Probably not slowly either.

**Mr. LeCornu:** Might come with a thud.

**Mr. Frisby:** I have one more thing. I asked the Forest Service if I could make totem poles out of those logs over there? They said it was okay but they told me I can't sell them.

**Mr. Lunde:** You can't sell the totem poles?

**Mr. Barlow:** I believe you can.

**Mr. Frisby:** I asked him and he said I can't.

**Ms. LeCornu:** That's private property. After it's in your hands.

**Mr. Frisby:** That's what he told me. See, I don't have any income, I don't work, but I'm trying to work at the art so I could try to sell stuff.

**Ms. LeCornu:** That's your livelihood.

**Mr. Lunde:** Do you have, is this the proper time to read the paragraph? Does it apply?

**Mr. Lobdell:** Yes, it applies.

**Mr. Barlow:** That's exactly what it means, and Roy was, I don't if I should even break in with this information, but this applies to your 10,000 board foot free use. Roy has been trained, as I have, that the free-use volume that you get is not supposed to be used for commercial products. I've learned something last night or the night before. Why don't you go ahead and share it with them. I did not know, and Roy does not know.

**Mr. Lunde:** This is an area that we in the Forest Service I think are going to take another look at and I think that's something you and your people with Greg need to take another look at that and then make that we aren't overstepping our bounds.

**Mr. Burgess:** That's why a lot of these agencies have a lot of these regulations that can be challenged in court under Title 8 of ANILCA, because it's clear that once you establish customary trade, that applies clear across the board to all your wild renewable resources. That's what the law says. National Marine Fisheries is one of the worst ones, on the sea otter. It's embarrassing to think that you're under a government that creates regulations

that are clearly inconsistent right within the regulatory process. You have to court to win and you can win very easily.

**Mr. Lobdell:** But to answer your question on the totems, under ANILCA Section 803, I'm just going to read it directly from the Act, "The customary and traditional uses by rural Alaska residents of wild renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools or transportation and for the making and selling of handicraft articles out of non-edible byproducts of fish and wildlife resources, taken for personal or family consumption, for barter or sharing for personal or family consumption, and for customary trade." So by this Section 803, you certainly, as far as I can read in this, and I think the Forest Service understands in this, that you can certainly make a totem pole and sell it. Or barter it. Or trade it.

**Mr. Barlow:** I guess the thing and I need to go back and maybe I'll get back with you later and talk about this, I'm not sure you even need a permit for it. I'm confused right now.

**Mr. Burgess:** You won't eventually. See that's the problem he's in now with this permitting process. Once a management plan is developed by any particular community, all the laws, all regulations necessary should be in the plan. You shouldn't need any. You shouldn't need one regulation.

**Ms. Frank:** You shouldn't need one permit.

**Mr. Frisby:** Because in my lifetime—I don't think—

**Mr. Barlow:** The intent of that was not to prevent you—it was to prevent people like myself I guess from moving in and cutting down the woods and selling it for lumber commercially, and then leaving you with nothing. But yet, at the same time, the 10,000 free board feet was made available so I could build myself a house, here in Alaska, because at the time it was created you couldn't buy lumber elsewhere. There was no town of Craig that had a lumberyard that I could go to. So when that was created, it was created for a different purpose than I think what you're talking about. I do want to check on that and get back to you on it. I mean I learned something two nights ago that I never heard before and I was not aware of.

**Mr. Burgess:** My ancestors are responsible for what we're discussing here. I trace mine back to the House of Burgess in Virginia. Directly.

**Ms. Schneider:** Is that right? Really?

**Mr. Fairbanks:** How long have you been here in Hydaburg?

**Mr. Burgess:** Oh, forty-some years.

**Mr. Fairbanks:** Is that right.

**Mr. Lunde:** I think you're a lucky man.

**Mr. Burgess:** Yeah, I kind of hope that I'm trying to correct the situation that happened all those years ago. That's the only thing that's keeping me going about this. It's pretty sad when you think back how the democratic institution could be based on falsehoods like this. That's really what it is, is a giant falsehood.

**Ms. Schneider:** Like Larry said earlier, don't give up.

**Mr. Burgess:** Young was on here today too and he was mentioning about the Federal—they will take over you know. I've been saying that for 14 years now. You know I've been on this regional council. But I'm not so sure now. After fourteen years nothing's happened. It doesn't look too good. Because there'd be more stuff going on right now. It's clear that it's a Boldt, its statutory treaty just like the Boldt decision. Why the United States government can't come out and empower the people so they can get together and challenge it, you know. They say you have self determination, but they won't empower you by even educating you. That's the saddest point of all. So I thank you. Thanks for all of it.



**Ms. Schneider:** Thank you.

**Mr. Burgess:** I won't bore you. It's time to hit the road.

**Mr. Barlow:** You actually have not bored us; I can assure you.

**Mr. Lunde:** It's been an education.

**Mr. Burgess:** I guess the road was pretty nice. I came over day before yesterday or yesterday morning. I didn't know what, I was going to roll down the hill or—. So Adrian and I notified of the DOT and they did come and fix it up. There's no reason that it shouldn't have been watched carefully cause it could very well 'cause somebody's death. I was real worried. There's no reason that they couldn't keep checking back and forth and not concentrate just on one spot. Okay thank you gentlemen and lady.

## End of Hearing

### ANILCA Section 810 Subsistence Hearings Polk Inlet Draft EIS KLAUOCK, ALASKA November 4, 1994

**Ms. Schneider:** Please state your name and spell it for us at the outset of your statement so we have it for the record.

**Mary Guthrie:** My name is Mary Guthrie. I'm the grand president for the Alaska Native Sisterhood. My tribe is from the Prince of Wales Island. That name is Gonaxuddi' and I come from the Mink House and my name in my language is Sá-Káa-Took' and I've also another one my adoption and that's Yantske Yáan SK'ei

TKLA-1

I'm here to offer testimony to the United States Forest Service with the purpose of stopping logging on the Prince of Wales Island. We're willing to negotiate—when I say “we,” I mean my tribe and the people I represent—for a lesser amount. But in that consideration I would ask that the Forest Service bring forth their past practices since inception as a United States Department, and lay that on the table in the negotiations so we can see the track marks of this entity. I, in turn, will bring the track marks of the representative ability of the Alaska Native Sisterhood, which is an 85-year old organization, which is the oldest Native organization in the United States of America. And as a tribal member, it is my inherent duty as a woman of the tribe, we being a matriarchal society, to take care of and perpetrate the harmony of the land and the people for not only my people and other tribes that may come across this land, but for visitors also. Traditionally, if you offered spoiled meat to visitors, you were shamed. And if you're shamed, you're just like killed. In that analogy, if we offered visitors a sore and tired and bleeding and broken clearcutted land, then I as a woman, as a holder of tradition and continuation of my people, am shamed, because I have not undertaken to take care of the people who come unto my land.

There are other technical arguments that can be argued against the Forest Service concerning the, we call it the traditional and customary use because we're First Nation People. But there is a lifestyle that goes with our concept of traditional and customary use, and not only the Native people feel that way. I was approached by somebody from Thorne Bay. Traditionally, Thorne Bay is a non-First Nation community, and we have little to do with each other. But the citizens on the Prince of Wales Island are beginning to choke on the devastation of our land. When I was approached by the couple from Thorne Bay concerning the—it's a goose—what kind of goose is that?—or gander—there's what's called the Honker Divide—as Grand President, I heard the same cry for help that I hear from the woman whose welfare benefits are cut, the same cry for help as the elder whose longevity is cut, and the same cry for help that I hear from the veteran. The tone and the caliber is the same because these people are hurting. And when the people are hurting, it's my job as

TKLA-1 Comment noted.

Grand President, and it's my job as a woman of the tribe, to alleviate that pain. And that's why I'm here talking to the United States Forest Service. And my ultimate objective would be to ask you to stop logging on the Prince of Wales Island. Not being allowed that—that is the point from which we will negotiate.

**TKLA-2** We understand that there's a long-term contract which feeds the Ketchikan Pulp Company and the Alaska Pulp Company. We understand that the bottom line for the harvest of 8.25 billion board feet on the Prince of Wales Island mainly, is not the main issue. The market demand is different than the Forest Service wants and needs to fill a long-term contract entered into in 1954. Some say 1951, I say 1954. The letter of the law does not read that the United States Forest Service shall harvest 8.25 billion board feet. The letter of the law says "up to." As limited as the Tongass Timber Reform Act is, it does address this issue in terms of the wants and needs of the inhabitants and the land. I call it consideration for women and children and other living things. The Forest Service is a powerful entity, and the Alexander Archipelago, of which the Prince of Wales Island sits in, is a delicate habitat. And it is a northern rain forest. The jobs that would be engendered from cutting down the timber on the Prince of Wales Island will amount to nothing when the trees are gone. What will you do, Forest Service, to give those great grandchildren of those loggers jobs then? Imagine that your trees have all gone from the Prince of Wales Island, and develop a plan from there. Develop a plan that is harmonious with the women and children and other living things on the land that you have management over. When my people, through the Alaska Native Brotherhood and the Alaska Native Sisterhood, talk management, they talk harmony.

We're not asking for something that doesn't belong to us, United States Forest Service. We're asking for a reasonable justice. And I don't sit here testifying asking for myself, but for the very land itself. I have been empowered by the Tlingits and Haidas and Tsimshians in the Southeast of Alaska to do this, to stand for the land and the water and all living things. We understand that we don't have the resources that we had, and we understand that past practices have not taken up the battle on both sides. We, as a people, and as Grand President I say this, have not always been there to fight when we should have, but neither has the Forest Service, and we're asking for that. We will negotiate from a stop-cutting foundation.

**Ms. Schneider:** Thank you.

**TKLA-3** **Jerry Jones:** My name is Jerry Jones. I have a few concerns about this Polk Inlet analysis. First of all, I don't see anyplace that the utility volume, and the profit made off of that, is calculated in stumpage rates, and it should be added in to reduce the profit and risk margin for the pulp mill. Secondly, I'm concerned that areas that are economically unviable are being counted in a commercial forest land, because the National administration is moving away from below-cost timber sales and there's no reasonable expectation that those lands will ever be harvested using current data. Also, the 30 units or so that they subtracted as not suitable that were accounted in the Tongass Forest Management Plan need to be deducted from the timber base until they're found to be suitable in making sustained yield projections.

**TKLA-5** I'm very concerned that most of the good timber is going to be logged out under this Polk Inlet EIS. The Forest Service admits that there's a value to roads; it pays a lot of money for roads. Yet, that money isn't being realized in the stumpage cost being charged to the pulp mill, and the most accessible timber is the only ones that can be justified right now. Using the numbers in all of them I believe to be deficit sales, if the numbers weren't inflated as far as stumpage goes. I don't know how they arrived at a positive return on mid-market stumpage rates given the fact that the current Twelvemile area sale is a negative 39 dollars a thousand. It takes an awful lot of good wood and pretty nice terrain to come up with the positive figures they have in this booklet.

I think that all below-cost timber should be eliminated from the offering. That's what I wanted to say.

**Ms. Schneider:** Thank you.  
(Pause in Tape)

**TKLA-2** Comment noted

**TKLA-3** Total volumes, including utility, have been used in the mid-market appraisal process.

**TKLA-4** Areas that were found to be unsuitable were updated on appropriate GIS data layers. This updated information has been given to the TLMP revision team.

**TKLA-5** Comment noted.

**Ms. Schneider:** This is a public hearing for ANILCA Section 810 for subsistence for the Polk Inlet Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Independent Sales Program. My name is Judy Schneider and I have been designated as the Hearing Officer for this proceeding. We informed the people who testified earlier this evening of the purpose of the hearings.

For the record, today is Thursday, November 4 and the time is 9:00 p.m. The hearing is held at the ANB Hall in Klawock, Alaska. The purpose was to get the views of the testifiers on how the alternatives proposed for the project might affect subsistence use of the Tongass National Forest. The hearing ran from 7:00 to 9:00 pm.

**Ron Williams:** My name is Ron Williams and I'm President of Klawock ANB and I've lived here in Klawock since 1990 and I've been riding the logging roads quite a bit and I've been kicking up garbage, waste oil, oil filters. I've run over and punctured my tire on their cable that's left out there after they're done logging; they don't pick it up. I've even come into town with brand new gear and the loggers will buy it back. But recently, I just come back in, I have 55 gallons of waste oil, one 55-gallon drum, I have about six 5-gallon drums of waste oil that's picked up on the logging road. Got it sitting in my yard right now trying to get rid of it. If they're going to log, especially around the lakes like Klawock Lake now is very, very polluted with oil. All our water that's coming out of there is brown. The kids are getting sick. I believe it's all the waste oil that's being left up there. Right now they're working on a place for home development called Mary Jackson subdivision. I go up there a lot. There's an engine, a Ford engine laying alongside the road that wasn't there before. A lot of logging camps, where they sit down to eat at the landing—they change the oil, they leave the oil filters. There's chain, I've brought out chokers. They leave a lot of stuff. I go in there, I have a couple of garbage bags in my truck and I bring out what I can of that crud. I could use some help up there at keeping that place clean.

I hear our lake may be dead now too, I don't know. Due to the rain bringing all that oil from off that hill. All that sludge hits the bottom and they said all our spawn for this year is gone. I don't know. I have to check into that more. All our fish, sockeye run will take another 50 years or more to rebuild. We go down here, right outside here, we get our subsistence. I don't know what we're—if we don't have it. The hatchery, the water that's coming in there right now, it's all brown. And the fish are suffering because they don't have good clean water. They just—if they're going to do their work out there—I know sometimes they have too—they blow an engine they have to fix it on the spot. I do it. I blow my engine or I blow something up, I'll fix it right there. But I'll take everything I've worked on, take it out. Around the lake, there's a lot of debris left from logging. The roads going into, toward Hydaburg, coming back, you can come out over here by Craig, just by going on the logging roads, a lot of debris out there.

That's my most concern is the garbage in and around logging roads. I was going to take a picture of the oil, the 55 gallons of oil that I found, but I didn't have a camera. But—I'd mail it to you guys—gallon quart cans; it's sitting in my driveway right now. About a hundred gallons of waste oil. Just being dumped there. They think all the Prince of Wales is a garbage dump. That's what I think. People think all the Prince of Wales is a garbage dump and they just dump their stuff in there.

I'd like to see some of the loggers themselves go out there and clean it up. It's their mess. They're leaving it out there. It's their mess. That's all I have to say. Thank you.

**Ms. Schneider:** Thank you.

**End of Hearing**



**ANILCA Section 810 Subsistence Hearings  
Polk Inlet Draft EIS  
KETCHIKAN, ALASKA  
November 8, 1993**

**Responses to Comments**

**Larry Lunde:** My name is Larry Lunde and I work here in Ketchikan in our planning shop for the Forest Service. I'd like to welcome you to our Polk Inlet subsistence hearings testimony tonight. Most of the EIS's that we've done in the past, or a lot of them that we've done for timber sales, we've done with our own people. We've got other EIS's that—we have more EIS's than we have people to do them, so what we've done is we've taken several of our EIS's and contracted with other firms to do those. Polk Inlet EIS we contracted with Ebasco Environmental, which is a consulting firm out of Bellevue, Washington.

So I'll do some introductions and then I'll turn it over to Judy here. So I'd like to introduce Randy Fairbanks, who is the project manager for this project for Ebasco. Jack Lobdell, who is a subcontractor working for Ebasco under a subcontract, and Jack's primary areas that he worked with were doing the cultural resource surveys and studies and then, under the subsistence, he led the subsistence survey or baseline survey where what we have are the old TRUCS data which are '86 or '87 vintage; so these guys went out and did some interviews with a cross section of people from the different communities and used that to help validate the previous data that we had, specific to the Polk Inlet area.

I'd like to introduce Peter Carr. Peter Carr is a public involvement specialist for Ebasco and he's also a—I haven't got the right word down what he is but anyway he takes care of the recording—so we could have a record of it. I'd like to introduce Judy Schneider who is the lead person for public involvement as well as document production for Ebasco, and she's also our hearing officer. So I'll turn it over to Judy. Did I introduce everybody this time?

**Judy Schneider:** Thank you Larry. This is a public hearing for ANILCA Section 810 for subsistence for the Polk Inlet Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Ketchikan Area Independent Sales Program. As Larry indicated, my name is Judy Schneider and I have been designated by the Forest Service as the Hearing Officer for tonight's proceeding. I'd like to welcome you and express our appreciation for your interest and effort to be here and share with us your views on this EIS. For the record, today is Monday, November 8. The time is 7:10. This hearing is being held in St. John's Episcopal Church in Ketchikan, Alaska. The purpose is to get your views on how the alternatives proposed for this project may affect subsistence use of the Tongass National Forest. We'll take the subsistence testimony first, and at the conclusion of that testimony we'll then move on to take other comments on the project.

We held an open house this afternoon from 4:00 to 6:00 to take questions and comments on the overall EIS issues other than subsistence. Some of you were here for a while. If any of you have questions on other than subsistence items, as I said, we'll take those comments after the early part of the hearing. There are also some forms on the table as you came in which you can use to submit written comments on the EIS, either subsistence or other issues. They're kind of self-mailers so they're pretty easy to use and we would encourage you to consider written comments and to try to be as site-specific as you can. Written comments must be submitted, postmarked by November 24th. If you haven't already done so, please sign the sign-in sheet before you leave so we have a record of your attendance. If you choose to submit testimony or make a statement, please first state your name and spell it for us so we have it accurate for the record. Does anyone here have testimony you would like to submit on subsistence issues?

(Silence). Okay, if not we'll move on to other issues. Who would like to go first? Actually, Randy, you're sitting at the table we had intended to let people use for their—it will give you a chance to spread out if you have some written material you need to refer to.

**TKET-1 Ben Hastings:** My name is Ben Hastings. I'm a 42-year resident of the state of Alaska, third generation Alaskan. My address is P.O. Box 8432, Ketchikan and I'm a property owner in Chomly Sound. I'm also a shareholder in Sunny Cove Mariculture Association, Incorporated. I would like to address the alternatives

**TKET-1** Comment noted.

TKET-1  
(cont.)

that Polk Inlet Draft Environmental Impact Statement has proposed, and we, members of Sunny Cove Mariculture Association, Inc., support Alternative 5. Do you need any more than that? You understand which alternative we're talking about?

**Ms. Schneider:** Yes.

**Mr. Hastings:** OK. Very well. I will hit a few of the important reasons why we support Alternative 5 over the other alternatives. We are in business as Sunny Cove Mariculture Association in Sunny Cove which is in Chomly Sound. We went into business 5 years ago, approximately and we have out of pocket approximately \$30,000 out of pocket. We also have approximately 5 years times nine members worth of work involved. The amount of work is all documented right here. I can document every ounce of work that we've done.

**Ms Schneider:** Would you describe what you're holding up so we know for the record?

**Mr. Hastings:** What this is, this is a log book that I've kept from 1983 until today's date, of everything that went on in Sunny Cove. The amount of work that has went into our business is incredible. What our business is for, is for raising two products at this time, possibly more in the future, and they are oysters and scallops. I have photographs. Who do I give them to?

**Ms. Schneider:** Peter will collect written and other things.

TKET-1  
(cont.)

**Mr. Hastings:** OK. What we do in Sunny Cove is we try to put out the finest products of shellfish in the state of Alaska. That is our goal. We've heard from our customers that our oysters are better quality oysters than those that are raised elsewhere in Alaska. Whether that's somebody's opinion or fact I don't know, but that's what we've been told. It's our belief that the reason why we have such a high quality product is because of a couple of things, and the most important thing to have for a high quality of oyster is a high quality of water. Without high quality water, we're out of business. We have every one of our permits in order to stay in business. We deal with DEC all the time and they come over to our site and take water samples. It is the opinion of the DEC that we can stay in business because of our high quality water. We've never had a problem in the past with our quality for our oysters. What we want to do is, we want to maintain that quality of water for our oyster farm. Alternative Number 5 allows that to happen. And the reason why I believe that Alternative 5 allows that to happen is because the area in the West Arm, Sunny Cove area of Chomly Sound, will not be disturbed due to clearcut logging, due to no roads being built.

Another reason why I'm very much in favor of Alternative Number 5 is, as we have stated to the Forest Service in the past, there is now one safe moorage left in Chomly Sound. Only one. And that is in Sunny Cove, in what we call Rich's Hole, which is located on the west side of Kay Island. We have a great amount of money invested in fishing crafts. To name a few, the Rio Grande, the Snark, and the Defiance. There's also other vessels that come into Sunny Cove or into Chomly Sound that are fishermen, that I've talked to on the radio, and the few anchorages that used to be there no longer exist. And the reason for this is because of logging. When you cut down timber, and it's cut down in a clearcut path all the way from Lancaster Cove to Dolomi to Clarence Strait, you do not have the ability for that wind to be laid down due to friction. In other words that wind blows from Clarence Strait and it blows now straight into Sunny Cove. I have documented cases of 100-mile-an-hour winds in the Babe Islands which looks right straight into Sunny Cove.

With Alternative Number 5, it leaves our back door closed as far as the winds coming across Sulzer Portage, because in the wintertime that's where you're going to get your big winds. They're going to come across the portage from the west Prince of Wales and they're going to blow right down our back door. If you look at the chart, there's a little teeny tiny, it would be on the west side of Sunny Cove, there's a little teeny tiny bay there that is totally protected from the timber. I'll submit this chart so you can see what I'm talking about. That's the little bay we're talking about. This is Sunny Cove and this is going up into the West Arm. You can keep this. I want to talk about that further



though. If you should log that peninsula, we will lose the only safe anchorage that we have, and without an anchorage we're out of business.

TKET-2

Alternative Number 3 is so bizarre that I can't even hardly talk about it. I was hunting there approximately 10 days ago and found flagging from the proposed access road on Alternative Number Three. Alternative Number 3 crosses our water stream, the stream which has been supplying water to Sunny Cove since 1900 when there was a cannery there. That alternative would go across that stream, which I might add, is a salmon-producing stream. And I would fear for not only those salmon—it would be a pink run that go up that stream, it's not a large run but it is a run—and I would also fear for my domestic water for my site, on Alternative 3. Alternative 3 is totally out of the question.

Another thing with Alternative Number 3, is Alternative Number 3 shows a road right behind where our cabins are. If that were put in, we might as well just pick up and leave, because while that logging is taking place there's no reason to even be around. The noise level would be unbelievable, it would not be safe in my opinion to be living around a logging area, and it would be virtually unacceptable to us.

Alternative Number 3 is also something that the Southeastern Seiners would like to address. I'm dealing with a representative from the Southeastern Seiners in Juneau. Their concern with Alternative Number 3 is fooling around with Sunny Creek. Sunny Creek is the third largest pink-producing stream in Southeast Alaska. So anytime you're dealing with a salmon stream, you're dealing with big concerns as far as the fisherman are concerned.

TKET-3

My final point is, if you look at the area between the salmon ladder in Sunny Creek—I don't know if you know where that is nor not—but approximately 2 to 3 miles up Sunny Creek there's a salmon ladder. It was put in by Fish and Game, I'd have to look in my record but I have it recorded here, about 10 years ago. From that area all the way down to what I call Dog Leg Lake, which is directly across, on the north side of Chomly, directly across from Dora Bay. So I'm going to say that's about five miles. In that area we, as residents of Sunny Cove, that area to us is sacred ground. And the reason that we feel that that is sacred ground is because we have four of our loved ones that have been placed in that area, from where that salmon ladder is to Dog Leg Lake. That's not the proper name, that's my name. We have several of our loved ones that have been put up there. And we would appreciate it if our sacred ground would be left alone. And here is one of the headstones of one of our loved ones that we put up there that we're preparing to put on the site. Anybody got any questions? Would you like these pictures of our operation?

**Mr. Lunde:** We'd certainly like to look at them. You might want to coordinate with one of us on the location of those monuments that you were talking about or at least make sure that we don't have something in relation to those—to our units or roads—

**Mr. Hastings:** You mean where Dog Leg Lake is?

**Mr. Lunde:** Yeah, but just so that doesn't slip through the cracks.

**Mr. Hastings:** OK. I need some help with that. That's all I have to say, if anybody has any questions.

**Ms. Schneider:** Thank you.

TKET-4

**Roy Hines:** My name is Roy Hines and I am also a homeowner in Sunny Cove, Chomly Sound, and I'm also one of the partners in the Mariculture Oyster Farm. Alternate Number 3, it should not be even thought about in my opinion. A few of the reasons is, is that we do get our water from the creek in that area, as was stated in the last testimony. And also, with the oyster farming in Sunny Cove, we have Corps permits and all the paperwork for two more sites on the outside of the bay, the little bay where Mr. Hastings stated. On that sheet of paper it shows where the other two sites are and we do have all the paperwork and the Corps permits.

**Ms. Schneider:** That's site 2 and 3 as shown on the map?

**Mr. Hastings:** I forgot that, thank you.

TKET-2 Comment noted.

TKET-3 Comment noted.

TKET-4 Comment noted.



TKET-4  
(cont.)

**Mr. Hines:** Also, I live there all summer long and I shrimp fish for my own personal use, and where I set my shrimp pots for subsistence is right in the area where you have the proposed log dump. Also, in the summer when I'm there, when it's daylight, the loggers in Dora Bay—the Indian-logging over in Dora Bay—you can hear the noise all the time of the logging trucks coming down the hill hitting their jake brakes, the loggers cutting the trees. And, in your proposal of Alternative Number 3, basically the same thing would be going on right behind our house. Also, along with that, the helicopter logging, the noise from the helicopters, and they would possibly be doing some helicopter logging in behind here in your Alternate Number 3 plan. Also the log dump, when they dump the logs in the water, you're going to have bark and other debris floating around and floating right into Sunny Cove. I also have at my house, a dock with a 50-foot walk ramp, and I call them Jill Pokes for my float, and I've had debris floating in there, trees, etc., from the area over the logging in Dora Bay. The other thing is, what Mr. Hastings stated, my mother and father and my best friend and also my brother-in-law, Rich Andrews' dad, is buried in the area, from where you're logging, where it says 235 down on the red line, all the way down to where the log dump is; that's where my mother and father, and Rich Andrews' dad is buried. They were cremated, and also my best friend is up on Dog Leg Lake or something. So I'm completely against the Alternate Number 3. I also support Alternate Number 5. That's all I have to say.

**Ms. Schneider:** Thank you, Mr. Hines

TKET-5

**Mike Haddix:** I'd also like to make some general comments. My name is Mike Haddix. My address is 83 Mountain Ash Heights, Ketchikan. I am here to basically make some comments about the McKenzie Inlet area of the planning area. I'm a property owner in Saltery Cove which is just outside of the area. McKenzie Inlet is just to the west of Saltery Cove. Any of the alternatives that include road building or timber harvest, primarily road building, in the McKenzie Inlet area I'm personally opposed to. It's hard for me to understand the engineering that went into that, but if you've been in McKenzie Inlet, you've seen since I've been here 16 years there's been four major slides in McKenzie Inlet. Three of those are major slides. It's my opinion that those slides occurred when logging and road building was being done in the other areas. I can feel my house shake—there's no reason to believe that those slides didn't occur, and they occurred about that time, when road building was going on in other areas, on the outside in Scowl Arm, on the Sealaska or Kasilco land. So when that blasting was occurring some of those slides did occur. Anyhow they're significant slides.

And the other point to be made about McKenzie is it's one of the few areas over there that there's no active logging going on or hasn't been for quite some time, it's the only place in Polk Inlet and Scowl Arm. With all the Forest Service Federal land harvest, Sealaska and Kasilco harvest, it's the only place. There's a minor area, the Old Tom's Creek Natural Area which takes in that drainage, and then McKenzie to the other side, but that's the only place left over there. So people that live over there, have property over there, the whole area's been impacted so heavily, not only with the timber harvest but with the activity there, with two logging camps and Forest Service administrative camps and new roads. A logging camp at Smith Lagoon has been there for a long time. Those areas have been impacted, in my opinion, too heavily, and I'd like to see the McKenzie Inlet area, if anything, have no harvest in it. For sure no road building in that area. That's just a comment.

**Ms. Schneider:** Thank you, Mr. Haddix

TKET-6

**Elzie Isley:** My name is Elzie Isley, (Spelled it). I live at 2533 Third Avenue. What I have to say really doesn't have much to do with this. I support Alternate 5. But what I want to show you is this little thing here. You're taxpayers, I'm a taxpayer. Do you know what this cost us? It cost two and a half million dollars.

**Ms. Schneider:** Mr. Isley, for the record, would you tell us what you're showing the people here?

TKET-5 Comment noted.

TKET-6 Comment noted.

**Mr. Isley:** I'm showing you the EIS for Polk Inlet that weighs 10 pounds. They've made—approximately 500 of them have been mailed out. Figure that into two and a half million dollars and see what each one of them is costing us. I kind of worry about a company that is hired by our government to do a study when they think that they find some spotted marmots, say, they begin to yoo-hoo and all this and that according to the paper. Now I'm not sure that I want somebody out there that's out there just trying to find something. If I did I'd go out and show them what's out there. But the way it is, they'll never find out from me. I have nothing against what's going on but I want you people to be aware of what this is costing us. Two and a half million dollars. I believe you said that's approximately 24 dollars a thousand.

I was just over to Prince of Wales Island, and the timber that they're logging over there is really not worth 25 dollars a thousand. I don't know how in the hell they get that price. So you want to think about all these things. And there is a question I'd like to have some of the people from Sunny Cover answer me. They keep saying they get their water out of the creek. Does this creek have a fish run on it? And you get your water out of it? And how does it taste when the fish are all dead in it?

**Unidentified Speaker:** Where we pick up the water is above the—before the fish—

**Mr. Isley:** Before the fish get to it. That's what I wanted to know. I'm thinking they got to strain it. Other than that I really don't have anything to say, but I wanted you to be aware what this is costing us. Thank you.

**Ms. Schneider:** Thank you, Mr. Isley. Anyone else? If not we thank you for your comments. They will be considering them as we move into preparing the final EIS which, unless you've asked your name to be taken off the mailing list, you'll be receiving sometime early next year.

**Mr. Lunde:** The meeting is scheduled to go till 9 so if we have additional folks that come in that would like to give information, we can visit or take a break or whatever but we'll need to sit back down. Roger, did you have anything that you wanted to say for the record?

**Roger Ziesak:** Uh, yeah. Give me a few minutes to get organized here.

**Mr. Lunde:** So what do you need? A couple minutes?

**Mr. Ziesak:** Yeah. I'll dig it out.

**Mr. Lunde:** We can probably just sit back and wait if you guys don't mind. We're scheduled to be here till nine so at least we have to be here if somebody does come back in, we'll have to just sit back down again.

**Ms. Schneider:** If you'll give us your name and spell it for us please.

**Roger Ziesak:** My name is Roger Ziesak (spelled out) and I live at 15033 North Tongass Highway here in Ketchikan. I'd like to comment tonight on the Polk Inlet Draft Environmental Impact Statement. I have several comments.

TKET-7

First, I thought the document for its size was very well put together. It was relatively easy to follow the discussions throughout the document. Specifically, I'd like to go on record as favoring Alternative 4 based on the projected lower operating costs, the reduced amount of helicopter yarding, and the higher projected returns to both the Forest Service and the state of Alaska. I believe that there are other minor changes that can be made to make the alternative more economical and thereby provide a greater return to both the state and the Federal government and I believe that those should be, those changes should be made.

TKET-7 Comment noted.

TKET-8

Secondly, helicopter units need to be operable from a safety standpoint. The very steep slopes that are sometimes encountered create a significant safety hazard due to the unstable footing for ground crews who are trying to work in the rotor wash, as well as the obstacles being too close to the helicopter as it attempts to hook up a load. I believe that units that average over a 70 percent slope should not be considered unless the most hazardous areas are left or deleted.

TKET-8 See Response to RZ-2 in Appendix H.



## Responses to Comments

TKET-9	Third, if the Forest Service requires new types of harvesting techniques, which is a big part of this Draft EIS, then appropriate costs should be developed to make sure that the burden of operating under this system does not fall upon the operator, whether it's long-term sale or independent sale. The safety factor when doing these kinds of cuts, especially in Southeast Alaska, given the steeper slopes, the rockier ground, need to be given special consideration. And, the flexibility for a sale administrator on the ground to address safety concerns should be of paramount importance in this EIS once it goes through the process and harvesting actually begins. There should be the flexibility to make changes to allow people to be safe. Visuals are a relatively important issue in Southeast because of the enormous amount of cruise ship traffic we have. However, I would maintain that using a national standard for visuals is too broad a brush application for Southeast and, rather, local preference should be the driving force behind how visuals are used in the EIS process.	TKET-9 See Response to RZ-23 in Appendix H.
TKET-10	Subsistence issues—again, I believe it's a local preference that should take priority, specifically residents of Ketchikan or other areas that specifically use those areas and can make critical comments. I myself do not subsistence use the area, but between local preference and a road-closure plan that will spell out which roads will be closed, which roads will allow two-wheel access, etc., would be, I believe, the way to approach the subsistence issue.	TKET-10 Comment noted.
TKET-11	Again, from an economic standpoint, I think, and from an operability standpoint, when the Forest Service is calculating the volumes and the acres in the various alternatives, I believe it's important that acres and volume below 8,000 board feet per acre should not be counted, as these are not counted as part of the allowable sale quantity in the Tongass Land Management Plan, and therefore would represent an error in the calculation of the volume. Plus, typically, this sort of stuff is unmerchable and is unloggable.	TKET-11 See Response RZ-5 in Appendix H.
TKET-12	The EIS proposes a couple of new log transfer facilities. If any of those log transfer facilities are adopted, I would strongly recommend that rather than having large A-frame type structures, that the Forest Service recommend low-cost, low-impact, low-angle slides, beaver-type slides or slides on steel rails, which meet the EPA requirements for less than three feet per second, but still do a very economical job of getting the logs in the water. Economically, again for isolated areas on the Project Area, an analysis should be done to see if they pass what's called in the book the mid-market test. This should be done both on these isolated entries and on whatever the preferred alternative is as a whole. We want to make sure that these sales are going to work in any market condition and not just for example, say, a very high market.	TKET-12 See Response RZ-7 in Appendix H.
TKET-13	Another issue is best management practices versus specific guidelines for specific units, or what have you, on the individual alternatives. I strongly support the continued use of best management practices. It's a method of doing business out there, if you will, that's proving very successful. The BMP's have just been updated and are significantly easier to use and understand, and I believe that they're going to continue to be the best way to go. As long as they're continually updated to reflect new ideas and new procedures, I think that they're appropriate.	TKET-13 See Response RZ- 11 in Appendix H.
TKET-14	One of the problems that's run into in these things is questions that come up again concerning differences between Forest Service procedure and safety procedures, for example with OSHA. I believe it's important in this document that clearance be given, and deference be given, to OSHA regulations allowing guyline circles, or corridors, in areas that may require it. There've been quite a few problems out in the woods. Those things need to be avoided. People need to be safe when operating in the woods.	TKET-14 See Response RZ-13 in Appendix H.
TKET-15	With regard to indicator species and the write-up on the various species in the book, for the most part I found it quite good. One of the things that is a little confusing is information on the goshawk. There is not much information on the goshawk in Southeast Alaska, or in a lot of other areas for that matter. The bird isn't particularly endangered; it's just rare. And the factual information is still missing for a large part and more of that information needs to be gathered before blanket-type protection measures or specific guidelines are established. Because of the lack of credible information, I would question whether or not the goshawk should be an indicator species, because it's difficult to tell if it's indicating anything.	TKET-15 See Response RZ-28 in Appendix H. Also, the goashawk is not used as one of the indicator species in the Polk Inlet EIS.



TKET-16

The evaluation in the write-up for protection of anadromous fish—salmon, steelhead, etc.—was relatively on the mark I think, but when evaluating the potential risk to those species' fish populations, it should be noted that a relatively high percentage of streams in Southeast are at or above capacity it seems like these days. And normal die-offs, what have you, that occur to correct this natural situation should not be considered the result of timber harvest as they appear to be for this EIS. There are quite a few other factors out there that affect the salmon and steelhead and more discussion I think needs to center on that.

TKET-17

Under the cumulative effects of harvest on Prince of Wales and the study area, I think one of the things that needs to be discussed is, well it talked about all of Prince of Wales as a whole. It did not seem to concentrate on or include the LUD I or LUD II acres, the wilderness or roadless area acres. While that allowable sale quantity that might be represented by those wilderness or roadless areas obviously isn't available to cut, it's still I think prudent to include it in the analysis to show what the overall effects are on the island. Essentially I think that concludes my comments and I appreciate the opportunity.

**Ms. Schneider:** Thank you.

**End of Hearing**

**ANILCA Section 810 Subsistence Hearings  
Polk Inlet Draft EIS  
SAXMAN, ALASKA  
November 9, 1993**

**Larry Lunde:** My name is Larry Lunde and I work here in Ketchikan with the Forest Service and my position basically is working in the planning department as a project team leader. The projects that I've been working with have been done under contract with consulting firms to do work similar to what our regular employees do. So I'm basically a liaison person between the Forest Service and our contract people. We've contracted the Polk Inlet EIS with Ebasco Environmental; they're a consulting firm based in Bellevue, Washington. So I'd like to introduce Randy Fairbanks, who's their project manager, and Jack Lobdell, who is a subcontractor with Ebasco, and Jack was responsible for the cultural resource investigations as well as the subsistence baseline information, where we actually went out and conducted some interviews in different communities to try and validate the TRUCS information that was done several years ago in relation to Polk Inlet to bring that information closer to home on the project.

I'd like to introduce Peter Carr. Peter is a public involvement specialist for Ebasco and he's also handling our equipment so he can capture on tape whatever we want to have on tape. I'd like to introduce Judy Schneider who is in charge of the public involvement program for Ebasco in this project as well as document production, and she's also our hearing officer. With that I'll turn it over to Judy.

**Judy Schneider:** Thank you Larry. This is a public hearing for ANILCA Section 810 for subsistence for the Polk Inlet Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Ketchikan Area Independent Sales Program. As Larry noted my name is Judy Schneider and I have been designated the Hearing Officer for tonight's proceedings by the Forest Service. I'd like to welcome you and express our appreciation to you for your interest in the project and your effort to be here and give us the benefit of your views.

For the record, today is Tuesday, November 9. The time is 7:10. This hearing is being held at the City Hall in Saxman, Alaska. The purpose of the hearing is to get your views on how the alternatives proposed for the project may affect subsistence use of the Tongass National Forest. We will accept comments after the subsistence testimony on other aspects of the Polk Inlet EIS if you have other comments you'd like to make. The hearing is scheduled to run until 9:00 but we will stay as long as it takes to get comments from whomever shows up with comments to share with us.

We also invite you, if you have further comments you think you might want to

**Responses to Comments**

**TKET-16** See Response RZ-37 in Appendix H.

**TKET-17** See Response RZ-39 in Appendix H.

make after you leave, to send written comments into us. The comment period ends November 24th so be certain that any written comments you send are postmarked by that date. I believe those instructions are on that written form. If you choose to give testimony this evening we'd ask you at the beginning state your name and spell it for us so we have it accurately for the record. The testimony, the comments will be transcribed and will be included in the final Polk Inlet EIS. The comments we receive at the various hearings we've been holding throughout the area and adjacent areas will be considered as we prepare the final Environmental Impact Statement. You can deliver your testimony from your seats or you can come up here to the corner of the table, whichever you prefer. We have some pretty powerful microphones here so we can catch you from any location. With that, I'd ask you to decide who would like to go first among yourselves. (Pause) Mr. Charles?

TSAX-1

**Melvin Charles:** My name is Melvin James Charles (spelled out) and this here logging that you're about to have here in Polk Inlet, I would also like for the U.S. Forest Service to give the public the history of Twelvemile Arm fisheries in which there was a strong substantial fisheries there for many many years and I personally logged in Twelvemile Arm for a great number of years and I have watched this here fish depleting every year. And in our heavy rainstorms I would see that the whole channel would change colors due to the silt that's coming down. And I'm just opposed to this here any further logging in Polk Inlet. And all your heaviest timber is right close to the shore. And not only that I'm opposed to Cape Fox or anybody else logging in Northeast Behm Canal also, because of the sockeye runs there, and the sockeyes will be extremely depleted there as well. I really need to read more about this here Polk Inlet project so that's about all I have for now. Thank you.

TSAX-1 Comment noted.

TSAX-2

**Steve Connelly:** My name is Steve Connelly (spelled out). I live in Ketchikan, I also maintain a residence in Thorne Bay. I'm out on Prince of Wales for work and recreation approximately 150 days a year. From what I've read looking through the Draft EIS, the summary, and comparing and looking at the other documents for in-depth information, I think that the best management practices that the Forest Service is going to use will adequately protect the soils, fisheries, water, and wildlife. I think that the timber harvesting creates a diversity of habitat and the road system creates a better access which helps spread people out throughout the island rather than concentrating on small areas for subsistence and other recreation use. That's been my experience, that the roads help spread people out and you can go hunting and fishing and it's easy to do it and never see another person because there is such good access. If you get certain areas where you don't have access everybody seems to be kind of stuck on the beach or going to the same fishing and hunting spots. So in my opinion I think that this really won't have any negative impacts on any of the subsistence or other use and might even enhance it. That's all.

TSAX-2 Comment noted.

**Ms. Schneider:** We'll be here for a while so maybe we'll take a little pause and see if anyone else shows up as the evening progresses.

**Mr. Connelly:** I notice that there wasn't a meeting in Thorne Bay this time. How do you decide like what communities or where you're going to have the meetings?

**Mr. Lunde:** What we do is we go through and do a subsistence analysis; and, we look at all of the communities that the records indicate or findings indicate use of the area, and then look at what percentages and those kind of things that that community uses; and then come to a conclusion which ones to include or not to include. The ANILCA law, basically all it says is that a hearing will be held in the vicinity of the project, so technically we could just do one hearing. But, we also try to take advantage of, try to get the folks that are directly involved with the project as much as we can without trying to go all over the world, and it just happened that when we looked at all the data and everything it indicated that we pretty much needed to concentrate on Craig, Klawock, Hollis, Hydaburg, Kasaan, primarily because they are either in the Project Area or right immediately adjacent to it and the roads that access into it and the use patterns. And, through the cumulative effects analysis on habitat of different species like deer, martens, and the furbearers,



it indicates that somewhere down the road there may need to be a restriction not on subsistence use but on the nonsubsistence users. So that automatically brings us to Ketchikan, which is a nonrural situation and when we come to Ketchikan we also try to make sure we have a meeting in Saxman. And, if we only have one here, why our priority would be to do it in Saxman.

**Mr. Connelly:** Well, that's why it just seems strange they had one in Klawock and Craig. They're a couple miles apart. If you had one in Klawock you could take that Craig meeting and go throw it in Thorne Bay and maybe people from the north end of the island could get into Thorne Bay or something. Because you had three you know, kind of all within 20 minutes of each other on the road system.

**Jack Lobdell:** I might say that the characteristics of use for each of those communities in the Polk Inlet area was very very different and so I think that also aided in the selection.

**Mr. Connelly:** Right, but these meetings are open to anybody, just so people can get to them. I mean Craig and Klawock got their differences but at least they all got a forum there. If you had one in Klawock, people from Craig could easily just drive there and go to that meeting. It's like, you know. I'm basically from Thorne Bay and here I'm in Saxman, I just happened to be in town you know so I could do this.

**Mr. Lunde:** We had a meeting in Thorne Bay for the Control Lake Project. And I know there was one individual who called the Forest Service and I talked with him. I don't recall his name, I don't think it was you—

**Mr. Connelly:** No. . .

**Mr. Lunde:** —and they were expressing that concern too, and I explained that to them and I also, I offered to meet with that individual but they wanted a follow up that week, I was going to be out, or I invited him to come up to the Control Lake meeting the following Tuesday; and as it turned out, neither he nor others came to that meeting either. So there was an opportunity and—we generally will talk about more than one project at a time.

**Mr. Connelly:** I was just curious, I never knew, I noticed how it sorta moved around a bit—I wasn't sure what the process was for selecting them.

**Mr. Fairbanks:** The primary reason was the percentage of subsistence harvest that that community gets from that particular area. And Thorne Bay was fairly low compared to the other communities that we had meetings in.

**Mr. Lunde:** It's a good question. As we do more and more projects we're learning more and more the value and the need to get public involvement and a lot of times the only way we can get that is actually to go to—I guess folks are busy in the evening and they tend not make it to a meeting so—that's a good question.

TSAX-3

**James Llanos:** I've watched three of these subsistence hearings now, and it seemed that the different EIS's and some from up north, down south, here, and in between, and the thing that still bothers me is that, and I think I mentioned this to you some time ago, is that you see these organizations and these outsiders, these outside people, they come and they ask you questions, they gather up all this data, and then they go back and analyze what it means to THEM, what THEY THINK the subsistence impact is on THAT PERSON. So it's an interpretive process and it's about the only way that we can probably do it at this time, short of asking probably some significant and in my case, I would stress a NATIVE input, some sort of Native representative, to actually help write the subsistence section because what subsistence means to you, and to somebody in Point Baker, and to somebody in Klawock, it has a different texture. It may be still the same piece of cake but it's either the frosting, or it's the cake, or it's the filling inside. You know, it's a different flavor of the same thing. And to hear people testify, you know, or lack of testimony, draws me to the conclusion that there's very little faith in the subsistence process. I'm not talking about just with the Forest—the whole issue: State, Federal interaction with the residents, with the Natives, there's a missing chunk. And it'd be really great if we could get some of the Natives to actually sit down and maybe write a section of this book, and say what it really means from their standpoint in the document, to the decision-maker, and

TSAX-3 See comments of Mr. Lobdell and Mr. Lunde below.



say, this is what the impact is going to have on us as a nation. Okay? Because the separation really is there. Thorne Bay is a good little community, and it has its own subsistence issues. But they're different from the people living in Kasaan.

**Mr. Lobdell:** In a sense, the field survey that involved the interviews of 50 household members from different households to determine what their subsistence priorities were and their percentage of use in the area was intended to do that in an independent way that gave weighted representation to those persons closest to the Polk Inlet area, or those persons who used the Polk Inlet area.

**Mr. Llanos:** But, again, this is a tool that you're using to WEIGH the impact on someone else. See what I'm saying? How important is your religion to you? It's very important. Or, GOD! IT'S SO IMPORTANT! Which is the greatest emotion? What carries the most weight in either the value or the testimony? Your interpretation of me saying it's very important—oh, it must not be very important because he's not jumping up and down and hollering. It must be just kind of important. So it's an interpretive thing. And I think you'll find that most Natives won't jump up and down and holler. When they say something to you, there's a lot being said, that you might not be hearing.

**Mr. Lobdell:** In addition to just counting and getting those types of data, there was an attempt made to be somewhat interpretive, by myself, and Steve Langdon, and the two interviewers.

**Mr. Llanos:** I'm not objecting to someone else interpreting it, because that's the only tool you have available to you right now. But what's to stop you from going to somebody in the Native community who really knows about subsistence and say, "We would like to contract with you to look at subsistence issues?" Is there something wrong with that? And it's very easy to do. Put it back into the person's hands who's the owner of the problem, and say, you write something here that we could use that most describes the situation. Of course I've had people inside the organization say, you're crazy, you can't do that, they can't be on the team. They're not.

**Mr. Lunde:** But one of the things I would hope that some folks had a chance to look at what we came across in the subsistence section and the findings and those kind of things. If we've missed the mark, if that could be pointed out, so that each time it's getting a little better. Until such time we either get it or we're able to incorporate, so that we're depicting the picture out there. And subsistence is a very very complex one, I mean, you ask anybody what subsistence is and you even get a different answer. And except for the folks that are out using and it's part of a way of life, that's much more tangible. Each person is going to give a little bit different explanation of similar things. Then if you start asking bureaucrats or lawyers—heaven forbid—who knows what you're going to get. And the state interpretations versus federal interpretations.

**Mr. Llanos:** What I think you folks with Polk should do is see if you can find out or get transcripts of what's happening in Hoonah—or is it Angoon? Hank Newhouse is up there right now; tomorrow he's going to get beat up, most likely. I mean, he's going to try to do a well-intended thing, and he may hear a lot of things. And that may be the stage where some of the people who might've testified here are giving him input. And it might not be at the hearing, it might be, if he's got some information, you might want to try to tap into that. As something real as a feeling. Cause I think that's where there's a lot of action going on.

**Mr. Lunde:** That is a good idea. If we get stuff from Hank, but then also through the folks that we had contact with last week. It's a good thought.

**Mr. Charles:** What's going to become of this here subsistence? Are they going to get it together on working with us on our customary fishing rights?

**Mr. Lunde:** I really don't know, I—

**Mr. Charles:** I have been commercially fishing for 19 years before Alaska even became a state. And then all of a sudden my fishing rights was taken

away. I believe that is my customary and traditional right. Like I've been doing. A lot of people go through many, many years of their life studying to be a doctor or different trades that they're going to be in such as you or—and nobody deprives them of that right. I have trained myself all through my life to be a captain, and I am a sufficient, excellent fisherman to this day. And now I'm deprived of what I've been training myself for. The Indian rights and ways is pre-Constitutional and extra-Constitutional, and this is our traditional right to commercially harvest fish. The Federal government has not done anything any better for Alaska Natives than what the state has been depriving us of for all these years. You could take this much fish and then the Federal government is saying, yes, you can only take this much fish; that is a bunch of baloney, you know. I believe that we are entitled to 50 percent of the resources. So as this state of Alaska goes many times more its population than what it is now, I believe that we should have our 50 percent of the resources.

The Federal judge in Washington said that the Indians in Washington were entitled to 50 percent of the resources of the fishing in Washington. What is resources? Does that mean only fish? It does not mean only fish. What is equal compensation? Have we received equal compensation? The Alaska Native Claims Settlement Act is totally illegal. Anybody who knows that can understand that. It's supposed to be 60 percent of the votes approving of this—there was no votes on it. Only representatives in Washington. Which they had no right to do. There is a lot more to be done. That's all I can say for now.

**Mr. Lunde:** There are a lot of interesting issues ahead of us to deal with; it's very complex.

**Mr. Connelly:** Well thanks for the opportunity to come and everything.

**Mr. Charles:** I don't believe we have any more people coming in here because the greatest majority of all people are in Angoon right now.

**Mr. Lunde:** You're probably right but what we'll do, we'll stay here till 9:00 because we published and said we'd be here till nine so we'll stay and you're welcome to stay with us—

### Pause in Tape

**Mr. Llanos:** —I missed out on silvers and king salmon the year before because on my job they needed me to put in the extra time, and I was really pissed about it. So, and it was because, I knew all these people who were waiting for me. I had a number of people who needed some fish; they needed some for the winter, they wanted some for now, because they knew the fish were here. And I couldn't do it. So I was hoping other people, I'd hint to other people "if you get some extra, so-and-so needs some." And it's not done. The closest thing we did to it this year was me and another fishing partner went out on a halibut trip. And all the halibut we got, we gave to the elders at a Tongass Tlingit meeting. Esther distributed it amongst all the elders there. That's the closest I could get. It was only a couple hundred pounds, but it was better than nothing. These people, they can't afford to buy halibut. They don't have jobs like everyone else.

I've got in arguments with people because I was born downtown. Remember old Indian Town? I was born, and it was still that way when I was born there. And it's not my fault that all these people came and Ketchikan grew up around us. There's people who live as close to a subsistence lifestyle living in downtown Ketchikan right now. And they're not counted. Because oh, the state says, they go through the thing—and believe me, it exists down there; you find people live that way.

**Mr. Charles:** Regardless what I believe, that the Alaska Natives should get 50 percent of all species of all fish and that we could manage our fisheries together, work with it together. All the fishing would be recorded, all the salmon that they catch would be recorded. So there'd be no complaints, and we just have to work with each other, and that's it. So if we have a fishery, closed fishing on halibut fishing, we could both have enough. All the seine boats should be no closer than 30 feet from the shore, the power skiffs, and they will never catch a king salmon. I've been a skiff man all my life, and I am one of the very best people there is in scooping up king salmon on seine boats; 250 king salmon in one set is no problem. And I scrape the barnacles off the rock with a power skiff when I'm

going along the shore. That king salmon is not going to get by it. If my power skiff is at least 25 to 30 feet off the shore, regardless how much salmon is coming into seine, even if king salmon is coming into the seine, when we close up, we will not have one king salmon in there.

You want to save the king salmon? Push the power skiff's off. Even if we get 50/50 of the fisheries, regardless, both sides keep their power skiff off the beach. Besides that, they're not going to kill all the kelp that everything else is living on. The power skiff is pushing right along the shore there, that kelp is curling up right behind the power skiff all the way, and what are you killing? Terrible.

**Mr. Lunde:** That's why you make me troll on the rocks!

**Mr. Llanos:** Yeah, we're not close enough.

**Mr. Charles:** And I don't believe that anybody should throw any king salmon back either. The seiners or the trollers. Because anything that you catch, even on trolling, when you turn that thing loose, it's not going to live. That's it, he's done for. Any king salmon that you catch in the seine, and you get that thing aboard the boat, it's done for. It's not going to live. You catch 15, 20,000 salmon and you're putting that aboard the boat in five minutes. It's not like the old days brailling like a long time ago; now it's a lot faster operation. And it is going. So if the seine boats or power skiffs with 25 to 30 feet off the shore, they're not going to catch any king salmon anyway. It'll be very rare that you catch maybe one. But anything that they catch. I don't think they should throw back. Anything the troller catches I don't think they should throw back. There's no reason for it. Everybody has a right to religion, and among our Native people, what you catch, as long as it's edible, do not throw it back. NEVER.

**Mr. Fairbanks:** Are you a commercial fisherman now?

**Mr. Charles:** Pardon?

**Mr. Fairbanks:** Do you fish commercially now?

**Mr. Charles:** Yeah.

**Mr. Fairbanks:** Do you have your own boat?

**Mr. Charles:** I did have my own boat but the state has deprived me of my right to harvest fish and so it's—I been halibut fishing and seining and black codding and trolling and dragging and gillnetting all of my life. And then the magic years was that they sent all the Natives that they could to the pipeline. And in that time, if you did not participate in any fisheries, you were out, on the limited entry program. That's it. So I was having a field day for three and a half years and didn't know I was going to be deprived of the rest of my life in fisheries.

**Mr. Lunde:** Have you looked at the halibut and black cod regulations that were supposedly put out today? The state has put out new black cod and halibut regulations today.

**Mr. Charles:** Oh, limited entry? In some areas they put black cod on limited entry.

**Mr. Lunde:** They have proposed rules out for the halibut too, where, when they go back to the boats and fish previously, that would be their...

**Mr. Charles:** The federal government, they should grant us our right to take 50 percent of the harvest. That's our right.

**Mr. Lunde:** You know, based on the Boldt decision and some of those kind of things that you are talking about in the state of Washington—that's something that I wonder how it's going to play itself out, where the state, or whether we've intermixed the subsistence stuff with the sport, like what you were talking about, and then the traditional and customary, which primarily is more from the Native communities, and then we have all that mixed up in the



big ball or mass. And then we start looking at sovereignties, and all of those issues. The lawyers are going to get rich.

**Mr. Llanos:** Maybe you know 'em. Especially he should know. Down south. Natives down south, they have a right to fish and sell that fish. It's their right. Up here, you have to sign up with the state, and you have to have a permit. There's no, what you'd call, inalienable type rights, as a Native. That's something I think is going to be worked on in the next few years. If you're a member of the tribe, you have every right to partake in that fishery. Irregardless of limits or whatever, you have first right.

**Mr. Fairbanks:** They still have licenses and permits required down south, too. But they have separate seasons for treaty seasons and then non-Indian commercial fishing seasons, and then Indian commercial fishing seasons, and then sports seasons—

**Mr. Llanos:** Some are honored there but up here, ho ho.

**Mr. Lobdell:** Some are but they've been on an individual basis. One example that I could cite is Kunitsi-Kenai Peninsula and their fishery on the Kenai River. They challenged in court, and were able to obtain a managed fishery, which they manage themselves.

**Mr. Llanos:** See this is the thing that's, it's happening more and more in Alaska, as the Natives figure out how to do this, they're going to gain their rights that are theirs, and it happens usually in a federal court. State, they'll ignore you RIGHT NOW.

**Mr. Fairbanks:** Take the equivalent of the Boldt decision up here—change a lot of things.

**Mr. Lunde:** I think that's coming, or at least it'll be introduced into the courts and dealt with.

**Mr. Lobdell:** At the same time that the Kunitsi were successful in gaining their traditional fishing right to the edge of tidewater in the Kenai River, this was the same time that urban residents of Alaska were attempting to qualify for subsistence rights, and were successful in doing so for a period of two years, which, because of just the amount of population, put an enormous burden on the resource and began to deplete the resource for the traditional subsistence user. So changes are probably still heading in that direction. And there's one more level, and that's called personal use fishery, and there have been some personal use fisheries in existence for many decades, and several of those still remain. In some areas where personal use fisheries were co-existing.

**Mr. Llanos:** Now that, the state recently, it's just the last few years, that if you want mulligans, you have to get a permit and you have to show how many pounds your vessel has traditionally harvested. And you're going to be taxed on it by the way. Even if you don't sell it you're going to have to pay a tax. Now that, you know—talking about—Natives want to go up there and get some, and they're just trying to make it difficult. Yeah, you're going to have to pay a certain minimum tax that will cover—the Alaska Seafood Institute puts that tax, which, it's like only one half percent of potential value that they place on it. But if they place a million dollars on that potential that's \$50,000. You know. It's kind of at the whim of the state to place a value on whatever they think it's worth. So—

**Mr. Fairbanks:** Well, Washington State was that way too before the Boldt decision came along, and then they changed their tune.

**Mr. Lunde:** I see it coming, I see it coming. Growing up in Washington, I would hope that Alaska will be more sophisticated because I think our Native communities are more organized and a lot more savvy on the system and have learned a lot from the lessons over the last years, whereas the tribal aspects of the state of Washington are a lot of small entities that, and I don't think they have as much collective bargaining, if you will. And things like what's going on in Angoon.

#### End of Hearing

ANILCA Section 810 Hearings  
Polk Inlet Draft EIS  
KASAAN, ALASKA  
November 10, 1993

Responses to Comments

**Judy Schneider:** This is the public hearing for ANILCA Section 810, Subsistence for the Polk Inlet Draft Environmental Impact Statement for the Ketchikan Pulp Company Long-term Timber Sale Contract and the Independent Sales Program. My name is Judy Schneider and I have been designated as the hearing officer for today's proceedings. For the record, today is Wednesday, November 10, the time is 11:15 a.m. This hearing is being held at the Community Hall in Kasaan, Alaska. The purpose is to get your views on how the alternatives proposed for the Polk Inlet EIS may affect subsistence use of the Tongass National Forest. The hearing is scheduled to run until 1 p.m. What we will do is we will take your statements on subsistence issues initially and after the subsistence comments we will move on to general comments on the Polk Inlet EIS and other issues other than subsistence. We ask that sign our sign-in sheet if you haven't already done so, so we have your names for the record. Before you give your statement, please state your names and spell them for us.

**Kathy Wasserman:** I guess I'll start. My name is Kathy Wasserman. I live in Kasaan, Alaska. I am familiar with the area through some work I've done there and I guess the only concern I have, and I know there is viable timber there, is that the riparian zones are protected. I believe when I was there, along the streams, around some of the areas, I know I have seen sometimes when the areas have not been protected and most of the different options that I have seen here I guess are more or less expected, are the ones I expected to see come out of here. I don't have any one option that I am really for or against more than any others. There seems to be a sort of trade-off. I guess I am mostly concerned about the streams in that area and how they are protected. I don't know if that is something is addressed at this hearing in particular, but someone else wants to speak. I may go over and look at, there are one or two of those maps I wanted to look over again.

**Ms. Schneider:** That is fine, but as you are doing it you may want to reference the maps, please reference the alternative so that we know what you are referring to.

**Larry Lunde:** Kathy, Peter can turn one of the microphones over that direction so if you have something you want to say from over there or you guys too, go for it.

**Ms. Schneider:** Just reference the map.

**Ms. Wasserman:** Why don't you give me just a minute again. I looked at the map in the EIS itself. Let me look at these colored ones and then I'll say something. If someone else wants to sing—(laugh)

**Mr. Lunde:** If you have questions about the maps, just go ahead and holler.

**Ms. Wasserman:** What is a brief rundown of the difference?

**Randy Fairbanks:** Well the primary difference is on the ground. Alternative 2 enters Indian River drainage, and part of Twelvemile Arm, and Alternative 5 avoids that area and puts in a little more, takes a little more volume from over in the McKenzie Inlet side. And both of those alternatives were designed to try to address wildlife and subsistence issues in different ways, individual issues as much as possible. Both of them are set up so that most of the harvest takes place in already fragmented or harvested areas. They avoid going into new areas as much as possible, but they do it in two different ways. Alternative 5 seems to be favored by most of the people in Hollis.

TKAS-1 | **Ms. Wasserman:** I certainly go towards Alternatives 2 or 5 and I just guess you don't have the maps right next to you. It is hard to figure out what is left out or what is added in.

TKAS-1 | Comment noted.

**Mr. Fairbanks:** It's primarily the Indian River area and the McKenzie Inlet area; those are the two tradeoffs.

**Mike Escoffon:** Well, I have a question I guess, or a statement. My name is Mike Escoffon, I am a City Council member here. Alternative 1 and Alternative 1a, one's no action, no action no harvest. What happens?

**Mr. Lunde:** Alternative 1a would stop all previously approved harvest that has not been harvested yet. Primarily the 1989-1994 operating period EIS and that is one currently KPC and to some extent independent timber sales are still being implemented from that previous EIS.

**Mr. Fairbanks:** For example, up in Little Coal Bay area, which is the area closest to Kasaan, that is an area that has not been harvested yet. There are eight harvest units that have been approved back in the 89-94 EIS and are scheduled for harvest, but have not been harvested yet. So under Alternative 1A, it would not be harvested, and the LTF would not be developed. Under Alternative 1 they would be harvested and the LTF would be developed.

TKAS-2

**Mr. Escoffon:** Well I go with Alternative 1a because I don't think the Forest Service is really practicing in the manner that is responsible as far as taking care of logged areas that are coming in as second growth and it's being pushed aside once you farm the land; you're just using it up and you're not going back and putting some effort back into it so it can produce more trees, quicker choking itself out. And there are a lot of areas I see around here where it is going to be pretty tough to thin. These trees are in thick, and they're getting to be 18 feet tall, and it's going to be a real hassle to start when they are a little younger and when it's a little easier to move around in there. I don't like the idea of pressure being put around Little Coal Bay area roads and Smith Cove, which sort of hits the back side of around here. There has been a lot of pressure being put on deer hunting there on the roads and it's getting hard enough to find the deer right now and my brother lives out in—he'll go every day, he'd go out for two weeks straight and not see a thing. I think 1a would be my choice.

TKAS-2 Comment noted.

#### Pause In Tape

TKAS-3

**Harry Wasserman:** I want the smallest timber harvest.

TKAS-3 Comment noted.

**Mr. Lunde:** We have two no actions. One is a regular no action which we would assume that all previous approved harvest would be accomplished. But we have about 50 units out there that we previously approved that haven't been harvested yet. And so we have a sub no-action alternative that would show the effects of stopping that and there are some legal reasons that we need to do that. And then these four all harvest approximately 125 million board feet. Then we took the different issues that we heard earlier and tried to respond to those; and so, we have four different scenarios for 125 million board feet.

TKAS-3  
(cont.)

**Mr. Wasserman:** Well, I would prefer the option that cuts the fewest number of trees. Which I guess would be the second option you described, 1a. I think unlike the people in Ketchikan you ought to go harvest the heck out of it, Cleveland Peninsula.

**Mr. Lunde:** I'm serious, sit down and we will turn that thing on—

**Ms. Schneider:** Do please state your name for the record.

TKAS-3  
(cont.)

**Mr. Wasserman:** My name is Harry Wasserman and I have lived on Prince of Wales Island for 4 and one-half years and it is my opinion that Prince of Wales has been turned into a tree farm by the Forest Service and I have been told that was the intent, that the Forest Service previously about a year or two years ago said that it was their intent to change the very character of the forests on Prince of Wales through logging, that it would not be as it was, that it would in essence become a tree farm, and I am opposed to that. I think that, at least until very recently, sustained yield was a myth and I think that it is very necessary to have logging. I like paper, I use paper every day; but, I don't think we are using our resource intelligently and I don't think sustained yield has been a reality and I don't think multiple use has been a reality. And I think it is really important to begin doing that. And I think Prince of Wales Island has



TKAS-3  
(cont.)

been abused and I think it is time to reverse the process, past time. I know that from talking with people in the logging industry in the Lower 48 that the private forests managed by logging companies by the paper companies in essence are sustained yield, but that is not how this has been logged in the past and I think that that is very important. The forest that we walked through on the way out to the Totem Park was second growth and my understanding is that it was last logged around 1920, somewhere in there. It is fairly obvious that the turnaround time is not as great, not as fast as had been previously stated. It takes a long time for it to come back. And when it does come back it doesn't come back with the diversity that it had before it was logged. I think that is a shame. I recognize that some things you have to give up. You have to give up the diversity, but the companies which today are saying that they can't make a profit without old growth and without the present rate of cutting are being very misleading because I know that they are going to be in business 15 years from now when this rate of harvest is virtually impossible and when there is no old growth to cut. If they can make a profit in the year 2030 without old growth, then they can make a profit now without old growth. So I think we have to revamp what we are doing, especially on Prince of Wales. I haven't been shot at in days— That is all I really have to say.

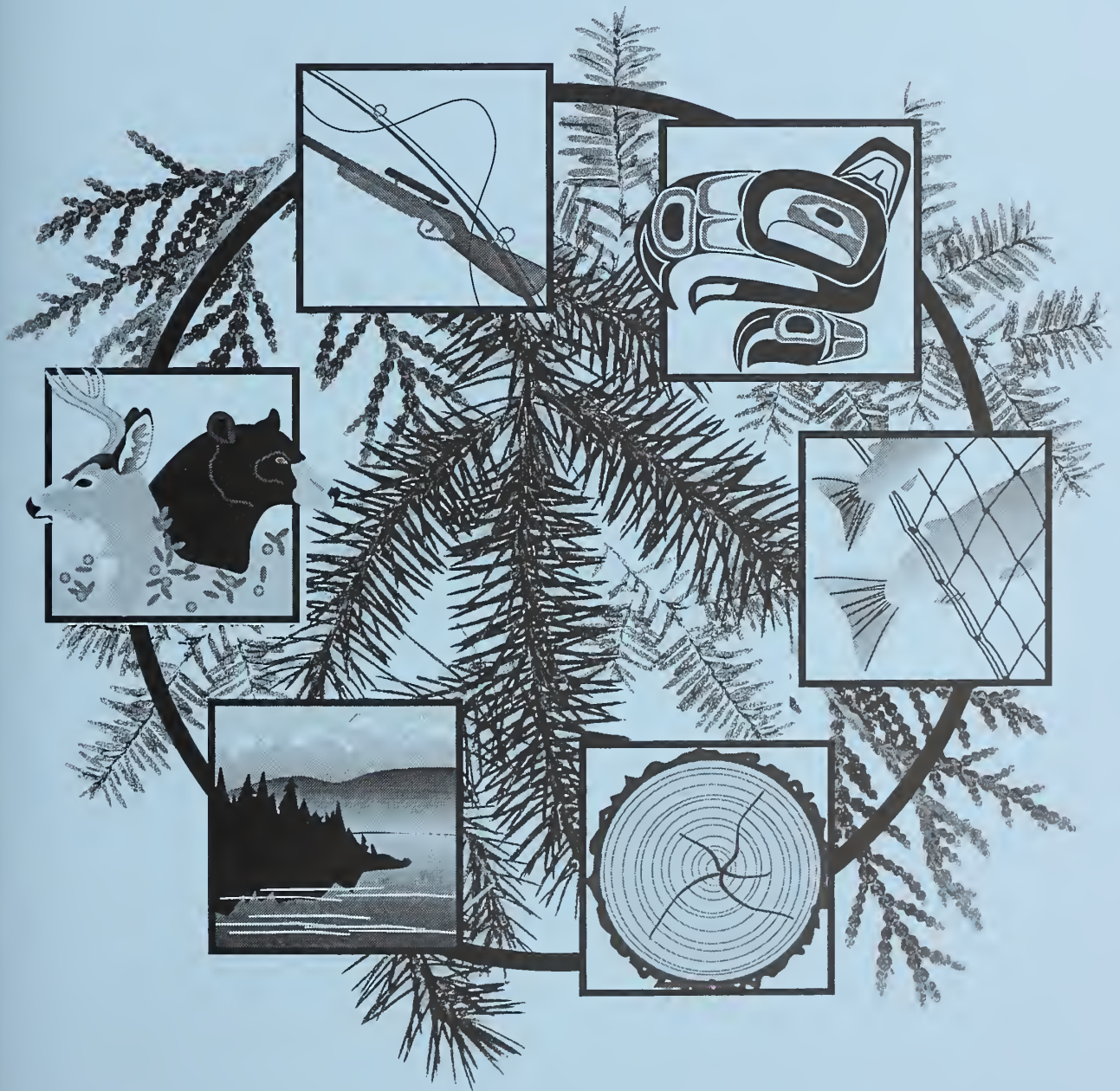
**End of Hearing**

Responses to Comments



# Appendix J

## Biological Assessment and Biological Evaluation







# **Polk Inlet Timber Sale**

# **Biological Assessment and Biological Evaluation**

Ketchikan Area - Tongass National Forest  
USDA Forest Service  
Alaska Region

by  
**Randal L. Fairbanks**  
and  
**Mari A. Smultea**

**Foster Wheeler Environmental Corporation**

March 1995





BIOLOGICAL ASSESSMENT  
AND  
BIOLOGICAL EVALUATION  
FOR THE POLK INLET TIMBER SALE

UNITED STATES DEPARTMENT OF AGRICULTURE  
TONGASS NATIONAL FOREST  
KETCHIKAN AREA

PREPARED BY: Randal L. Fairbanks and Mari Smultea  
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Ketchikan Area, Tongass National Forest

DATE: March 29, 1995



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# **BIOLOGICAL ASSESSMENT and BIOLOGICAL EVALUATION**

## **Polk Inlet Timber Sale**

**March 1995**

This combined Biological Assessment (BA) and Biological Evaluation (BE) was prepared for the Polk Inlet Project as required by Section 7 of the Endangered Species Act (as amended) (ESA), the USDA Forest Service threatened, endangered, and sensitive plant and animal species policy (FSM 2670), and the National Forest Management Act. As required for a BA, this document describes the occurrence of and project effects on species that are Federally listed or proposed for threatened or endangered status. Although not required, candidate plant and animal species within the Project Area are also addressed. This document also serves as a BE by including equivalent information on Forest Service-listed sensitive species. The BE is not required under the ESA, but is required by the Forest Service for all internal programs and activities (FSM 2672.4).

An Environmental Impact Statement is being prepared for the Polk Inlet Project. The action includes the harvest of approximately 4,000 acres of forest, construction or reconstruction of approximately 45 miles of roads, and the use of three to five log transfer facilities (from a pool of two existing, three previously authorized, and two proposed log transfer facilities). The Polk Inlet Project Area covers 208,649 acres, including 188,801 acres of National Forest System land. It includes Management Areas K17 (VCU's 610, 611, 621, 622, and 624) and K18 (VCU's 612, 613, 618, 619, 620, 674, and 675). Twelvemile Arm, Polk Inlet, McKenzie Inlet, the West Arm of Cholmondeley Sound, the Maybeso Experimental Forest, the Old Tom Creek Research Natural Area, and the community of Hollis are all inside the Project Area boundary. The Karta Wilderness Area borders the Project Area on the north. Most coastal log transfer activities will be centered in Twelvemile Arm and Polk Inlet. The Project Area includes portions of five Wildlife Analysis Areas (WAA's), including the majority of WAA's 1213, 1214, and 1317, and smaller portions of WAA's 1107 and 1332.

This BA/BE addresses 31 plant and animal species. It covers the endangered humpback whale (*Megaptera novaeangliae*) and Eskimo curlew (*Numenius borealis*); the threatened American peregrine falcon (*Falco peregrinus anatum*), Aleutian Canada goose (*Branta canadensis leucopareia*), and Steller (northern) sea lion (*Eumetopias jubata*); two candidate mammal species, six candidate bird species, one candidate frog species, and four candidate plant species. Further, it includes three bird species and ten plant species on the Forest Service Region 10 sensitive species list, but not listed as endangered, threatened or candidates under the Endangered Species Act.

## **I. IDENTIFICATION OF ENDANGERED, THREATENED, CANDIDATE, AND SENSITIVE SPECIES AND/OR CRITICAL HABITATS WITHIN THE PROJECT AREA**

Federally listed threatened and endangered species are those plant and animal species formally listed by the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS), under the authority of the Endangered Species Act of 1973, as amended. An endangered species is defined as one which is in danger of extinction throughout all or a significant portion of its range. A threatened species is defined as one which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Candidate species are those being considered for listing as threatened or endangered by the USFWS or NMFS. A category 1 candidate is one for which the agency has sufficient data in its possession to support listing the species as threatened or endangered. Category 2 candidate species are those species for which there is information indicating the species might qualify for endangered or threatened status, but for which further evaluation is needed. Category 3 candidate species are species that were considered for listing as endangered or threatened, but are no longer under consideration.

Species listed as endangered or threatened are provided statutory protection under the Endangered Species Act of 1973 as amended; candidate species are not. Therefore, under the Endangered Species Act, agencies technically have no legal obligation to take action on Category 2 or 3 species. Although the USFWS and NMFS do not have legal authority to regulate management of National Forest lands for candidate species, the Forest Service has agreed to coordinate closely with the USFWS and NMFS in an effort to prevent candidate species from declining to where they need to be listed as threatened or endangered (Memorandum of Understanding January 25, 1994).

The State of Alaska also has an Endangered Species Law which authorizes the Commissioner of the Alaska Department of Fish and Game (ADF&G) to list Alaska "endangered" species and species of "concern".

In addition to the aforementioned listings, species may also be listed by the Forest Service with sensitive status. Sensitive species are those identified by the Regional Forester for which viability is a concern, as evidenced by significant current or predicted downward trends in population numbers or density, or significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution (FSM 2670).

Table 1 summarizes the status of threatened, endangered, candidate, and sensitive species of animals and plants occurring on or near the Polk Inlet Project Area which are addressed in this Biological Assessment and Biological Evaluation.



**Table 1. Status<sup>1/</sup> of threatened, endangered, candidate, and sensitive species occurring on or near the Polk Inlet Project Area.**

SPECIES	STATUS	
	Federal	State
	End. Sp. Act	For. Serv.
<b>Animals</b>		
Humpback whale	E	E
Steller sea lion	T	
Alexander Archipelago wolf	2	
Prince of Wales flying squirrel	3	
American peregrine falcon	T	E
Arctic peregrine falcon	2	E
Peale's peregrine falcon		S
Osprey		S
Aleutian Canada goose	T	E
Trumpeter Swan		S
Eskimo curlew	E	E
Marbled murrelet	2	C
Kittlitz's murrelet	2	
Queen Charlotte goshawk	2	S
Harlequin duck	2	
Olive-sided flycatcher	2	
Spotted frog	2	
<b>Plants</b>		
<i>Aster yukonensis</i>	2	
<i>Calamagrostis crassiglumis</i>	2	
<i>Carex lenticularis</i> var. <i>dolia</i>	2	S
<i>Montia bostockii</i>	2	
<i>Cirsium edule</i>		S
<i>Glyceria leptostachya</i>		S
<i>Hymenophyllum wrightii</i>		S
<i>Isoetes truncata</i>		S
<i>Ligusticum calderi</i>		S
<i>Platanthera chorisiana</i>		S
<i>Plantanthera gracilis</i>		S
<i>Poa laxiflora</i>		S
<i>Ranunculus orthorhynchus</i> var. <i>alaschensis</i>		S
<i>Senecio moresbiensis</i>		S

<sup>1/</sup> E = Endangered, Federal or State; T = Threatened, Federal; 2 = Category 2 Candidate; 3 = Category 3 Candidate; C = Candidate, State; S = Sensitive, Forest Service Region 10.

There has been no officially designated critical habitat for any of these species at this time in Southeast Alaska, except for specific rookery (mating and pupping) and haulout locations for Steller sea lions (50 CFR part 226, August 27, 1993).

The USFWS has identified the northern goshawk and marbled murrelet as species of concern within the Polk Inlet Project Area (Letter from N. D. Holmberg, USFWS, March 5, 1992). In a more recent letter, the USFWS identified the Queen Charlotte goshawk and the Alexander Archipelago wolf as species that need to be addressed in the Polk Inlet Final EIS and also noted that two candidate species, the Harlequin duck and olive-sided flycatcher, should be considered in the Final EIS (Letter from C. Hale, USFWS, September 14, 1994). The threatened American peregrine falcon may migrate through the Prince of Wales Island area as may the Eskimo curlew, Aleutian Canada goose, and Harlequin duck, and the Steller sea lion may occur in adjacent waters (Letter from N. D., USFWS, Holmberg, March 5, 1992). The USFWS also identified that the spotted frog, a Category 2 candidate species, should be considered in planning (Letter from N. D. Holmberg, USFWS, April 17, 1992). The humpback whale and Steller sea lion were listed by NMFS in an assessment of the Project Area (Letter from S. Pennoyer, NMFS, February 6, 1992). NMFS completed a final recovery plan for the humpback whale in 1991. The Steller sea lion is currently listed as threatened (Federal Register Dec. 4, 1990; NMFS 1992). Critical habitat, in terms of specific rookery and haulout locations, has been designated for the Steller sea lion. There is none on Prince of Wales Island (50 CFR part 226). Critical habitat has not been designated for the humpback whale (Letter from S. Pennoyer, NMFS, February 6, 1992).

No threatened or endangered plant species are known to occur in the Project Area. Two category 2 plants, *Calamagrostis crassiglumis* and *Carex lenticularis* var. *dolia*, could potentially occur within the Project Area, but have not been documented there. In addition, 10 Forest Service-listed sensitive plant species could potentially occur within the Project Area, although none have been documented in the Project Area. Two of these species have been discovered on Prince of Wales Island near the Project Area.

No fish species known to occur in the Project Area have been determined to be threatened, endangered, candidates, or sensitive.

## II. THREATENED/ENDANGERED SPECIES ASSESSMENTS

### HUMPBACK WHALE (*Megaptera novaeangliae*)

#### Distribution and Population

Humpback whales are the most abundant of the eight species of endangered whales that occur in Southeast Alaska waters. Estimates of the North Pacific population range from 1,200 to 2,000 whales (National Marine Fisheries Service 1991) which is about eight percent of the pre-whaling population. These whales are regularly sighted in the Inside Passage and coastal waters of the Southeast Alaska panhandle from Yakutat Bay south to Queen Charlotte Sound. Humpback whales feed in Southeast Alaskan panhandle waters from about May through December, although some have been seen every month of the year. Peak numbers of whales generally occur in nearshore waters during late August and September, but substantial numbers usually remain until early winter. Baker et al. (1985) estimate that 300 to 350 humpback whales inhabit Southeast Alaska during the summer and fall.

The local distribution of humpbacks in Southeast Alaska appears to be correlated with the density and seasonal availability of prey, particularly herring (*Clupea harengus*) and euphausiids. Important feeding areas include Glacier Bay and adjacent portions of Icy Strait, Stephens Passage/Frederick Sound, Seymour Canal and Sitka Sound. Glacier Bay and Icy Strait appear to be important feeding areas early in the season, when whales prey heavily on herring and other small, schooling fishes. Frederick Sound is important later in summer, when whales feed predominantly on swarming euphausiids. During autumn and early winter, humpbacks move out of Frederick Sound to areas where herring are abundant, particularly Seymour Canal. Other areas of Southeast Alaska may also be important for humpbacks and need to be evaluated. These include: Cape Fairweather, Lynn Canal, Sumner Strait, Dixon Entrance, the west coast of Prince of Wales Island, and offshore banks such as the Fairweather Grounds.

Because the humpback inhabits shallow coastal areas, it is increasingly exposed to human activity. Consequently, these whales may be more susceptible to disturbance, displacement, and loss of habitat from environmental degradation in nearshore areas than some other whale species. Humpbacks summering in Southeast Alaska have been linked to each of three winter mating and calving areas in Mexico, Hawaii, and Japan.

#### Effects of Polk Inlet Proposed Actions on Population or Habitat

The recovery plan for the humpback whale identified six known or potential categories of human impacts to these species: hunting, entrapment and entanglement in fishing gear, collisions with ships, acoustic disturbance, habitat degradation, and competition for resources with humans.

National Forest management activities which may affect whale habitats or populations are generally categorized as acoustic disturbance and habitat degradation. These management activities include: the development and use of log transfer facilities (LTF's) and their associated camps, the movement of log rafts from log transfer facilities to mills, and the potential development of other docks and associated facilities for mining, recreation, and other forest uses and activities. Generally, with the development and use of LTF's and other docking facilities



for projects, there is an associated increase in recreational boating in the immediate vicinity during the construction and use of the facilities.

Most information and data for whales in Southeast Alaska are associated with the humpback whale because it is the most abundant whale occurring in Southeast Alaska waters. Seven other species of whales are present only seasonally as they migrate along the outer coastal areas, or occur only occasionally in the inside coastal waters of Southeast Alaska. The following discussion and analysis is primarily based on humpback whales, but is assumed to be applicable to the other species of whales.

Construction and operation of LTF's and other docking facilities are restricted to small, very localized areas of the marine environment. Two LTF's (Twelvemile Arm and Polk Inlet) are currently in the Project Area and three more are authorized to be developed under the 1989-94 Long Term Sale EIS (one at Little Coal Bay and two in McKenzie Inlet). Approximately 2 acres of marine benthic disturbance would be associated with bark deposition at these existing LTF's. Two new LTF's are proposed for construction under specific Polk Inlet Project alternatives. Two Polk Inlet Project alternatives propose no new LTF's (Alternatives F2 and F5) and two alternatives propose one new LTF each (Alternative 3 proposes one near Sunny Cove and Alternative 4 proposes one near Cannery Creek on Cholmondeley Sound). Less than one acre of marine benthic habitat would be impacted by the construction of each of these new LTF's.

There is little potential to directly affect whales with these facilities. During the summer of 1989, there was a report of a humpback whale entangled in some cables from an inactive LTF site on the Stikine Area. This is the only known direct effect incident related to LTF's.

Two potential indirect effects of LTF's and other docking facilities and associated activities have been identified: 1) effects on whale prey species, and 2) disturbance of whales by boat traffic associated with LTF's.

**Effects on Prey.** Nemoto (1970) noted that euphausiids and gregarious fish are the primary prey of humpbacks. Thirteen species of fish and 57 species of invertebrates were identified as humpback whale prey in Southeast Alaska. Humpbacks studied in Glacier Bay and Stephens Passage-Frederick Sound were found most frequently in areas of high prey density (Wing and Krieger 1983).

Construction and operation of all LTF's and similar facilities require U.S. Army Corps of Engineer and U.S. Environmental Protection Agency permits, and State of Alaska tidelands permits. The permitting process provides that construction and operation maintain water quality in the specific facility locations, and that marine circulation and flushing are maintained. All facilities conform with permit standards. Although the effects may vary locally, the major effect of leachates (i.e. terpene, alpha-conindendric acid, alpha-conindendrin, hydroxymatairesinol, linoletic acid, and dehydroabientic acid) from stored log rafts is upon invertebrates. Crustaceans, particularly shrimp and crab larvae, appear especially sensitive (Pease 1973). EPA measuring techniques may be required to monitor the LC-50 levels at each LTF (Peltier and Weber 1985) in order to insure impacts are limited to the approved "zone of deposit". A local increase in the herring and herring egg fishery could also impact this food item.

**Effects from Disturbance.** Humpback whale response to nearby boating activity varies from no apparent response to pod (group) dispersal, sounding, breaching, evasive underwater maneuvers,

and maintaining distance (Baker et. al. 1982, Baker and Herman 1983). Disturbance by boat activity has been suggested as one of the possible causes of observed changes in whale distribution in Southeast Alaska. Direct pursuit of whales by boats, and frequent changes in boat speed and direction appear to elicit avoidance behaviors more frequently than other types of boat traffic. However, whales may habituate to constant and familiar noise (Norris and Reeves 1978). Whales can be commonly found in some areas of Southeast Alaska which have considerable boat traffic. Whether they are habituated to boat traffic has not yet been documented. Adverse effects from current levels of boat traffic have not yet been documented.

Two basic types of boat activity associated with LTF's are log-raft towing and recreational boating by workers. Log raft towing frequency would vary between camps, seasons, and years, averaging about once a week during the working season (U.S.D.A. Forest Service 1989). Tug boats maintain relatively constant speeds and directions during log raft towing; constant speed and direction appear to elicit less avoidance behavior from whales than other types of boating activity (Baker et al. 1982). Log-raft towing routes are generally well established, and adverse effects from log-raft towing have not been documented.

Recreational boating activity by camp residents would vary between seasons, years, and camps of different sizes. This activity would be concentrated near LTF sites, other docking facilities, and camps. It is estimated that most recreational boating would occur within a few miles of the site, few trips would be made over 10 miles, and activity greater than 30 miles from a site would be negligible. This boating would involve frequent changes in speed and direction and may include some small amount of whale pursuit, if the whales are within sight of the camp or an occupied boat. However, the Marine Mammal Protection Act prohibits harassment of whales. The effect of such recreational activity on whales would depend on many factors such as size of the bay, depth of the waters in the bay, number of boats, individual behavior responses of the whales, etc. At the present time, there is not a quantifiable way to estimate these possible effects.

The following Forest-wide standards and guidelines have been developed for application on all Forest Service permitted or approved activities and have been incorporated into the Polk Inlet FEIS.

Provide for the protection and maintenance of whale habitats:

1. Avoid intentional aircraft flights below 500 feet above ground level in the known vicinity of whales on Forest Service permitted or approved activities, when weather ceilings permit.
2. Avoid intentional approach in a vessel of 100 feet or more in length to within 1/4 mile of whales on Forest Service permitted or approved activities, when safe passage exists.
3. Avoid intentional approach in a vessel of less than 100 feet in length to within 100 yards of whales on Forest Service permitted or approved activities, when safe passage exists.



Signs will be posted in logging camps and at public boat launches in the Project Area to describe legal restrictions and to educate the public and discourage the public from harassing marine mammals.

No direct adverse effects on whales from implementation of forest management activities are anticipated. Indirect effects may be associated with possible increased boating activity, but are mitigated by Forest Service and NMFS standards and guidelines.

## **STELLER SEA LION (*Eumetopias jubata*)**

### **Distribution and Population**

The Steller (northern) sea lion ranges from Hokkaido, Japan, through the Kuril Islands and Okhotsk Sea, Aleutian Islands and central Bering Sea, Gulf of Alaska, Southeast Alaska, and south to central California. There is insufficient information to consider animals in different geographic regions as separate populations. Centers of abundance and distribution occur along the central coast of the Gulf of Alaska and Aleutian Islands, respectively. Steller sea lions mate and give birth at rookeries in these areas.

In 1990, because of an abrupt population decline observed over the last 31 years (primarily in the former Soviet Union, Gulf of Alaska, and Aleutian Islands), the NMFS listed the Steller sea lion as a threatened species throughout its range. In 1989, the number of sea lions observed on certain rookeries from Kenai Peninsula to Kiska Island had declined by 63 percent since 1985 and by 82 percent since 1960. In 1989, only 25,000 Steller sea lions were counted from the central Gulf of Alaska to the central Aleutian Islands compared to 67,000 sea lions in 1985 (Reeves et al. 1992). Significant declines have also occurred on the Kuril Islands. Information on population trends in Southeast Alaska is limited, but existing data suggest that Southeast Alaska populations are stable or perhaps slightly decreasing.

The cause of overall population declines has not been confirmed. However, incidental mortality of sea lions in commercial fishing gear, shooting by fishermen, and reduced prey species due to commercial fishing operations have probably contributed significantly to declines (Reeves et al. 1992).

When the sea lion was given emergency listing as a threatened species in the Federal Register (April 5, 1990), buffer zones restricting human activities were established around rookeries west of 150 degrees west longitude (this area does not include Southeast Alaska). The closest Steller sea lion rookery to the Polk Inlet Project Area is on Forrester Island, west of Prince of Wales Island. A sea lion haulout used for sunning and resting occurs near the Project Area. Grindall Island at the south tip of Kasaan Peninsula is an important haulout area. It is not designated as critical habitat. A draft recovery plan has been prepared for the Steller sea lion.

Important sea lion food resources include walleye pollock, salmon, eulachon, and cephalopod mollusks. Steller sea lions forage predominantly in nearshore areas and over the continental shelf.



## Effects of Polk Inlet Proposed Actions on Population or Habitat

The NMFS provides a summary of factors affecting the Steller sea lion (Federal Register April 5, 1991). These factors include reductions in the availability of food resources, especially pollock, which is the most important prey species for sea lions; commercial harvests of sea lion pups; harvests for subsistence and for public display and scientific research purposes; predation by sharks, killer whales, and brown bears; disease; the inadequacy of existing regulations regarding quotas on the incidental harvesting of sea lions during commercial fishing operations; and other natural or human incidences such as shooting adult sea lions at rookeries, haulout sites, and in the water near boats. None of these factors are regulated by or within the jurisdiction of the Forest Service.

Southeast Alaska populations of Steller sea lions have not declined to the extent that other populations have. Harassment or displacement of sea lions from preferred habitats by human activities such as boating, recreation, aircraft, log-transfer facilities, log-raft towing, etc., are a concern with regard to long-term conservation of the sea lion in Southeast Alaska. Forest-wide standards and guidelines direct the Forest Service to prevent and/or reduce potential harassment of sea lions and other marine mammals due to activities carried out by or under the jurisdiction of the Forest Service, and these have been incorporated by reference into the Polk Inlet FEIS from the Supplement to the Draft Tongass Land Management Plan Revision (1991b). These Forest-wide standards and guidelines are as follows:

Provide for the protection and maintenance of harbor seal, Steller sea lion, and sea otter habitats:

1. Ensure that Forest Service permitted or approved activities are conducted in a manner consistent with the Marine Mammal Protection Act and the Endangered Species Act. "Taking" of marine mammals is prohibited; taking includes harassment, pursuit, or attempting any such activity.
2. Locate facilities and concentrated human activities requiring Forest Service approval as far from known marine mammal haulouts, rookeries and known concentration areas as practicable. The following distances are provided as general guidelines for maintaining habitats and reducing human disturbance:
  - \* Facilities, camps, LTF's, campgrounds and other developments should be located 1 mile from known haulouts, and farther if the development is large.
  - \* For aircraft flights on Forest Service approved projects, when weather ceilings permit, maintain a constant flight direction and airspeed and a minimum flight elevation of 1,000 feet (305 meters) within 0.5 mile (800 meters) of the haulouts.
  - \* For boat traffic on Forest Service approved projects, remain at least 0.5 mile (800 meters) away from hauled-out harbor seals during the pupping and rearing season (15 May to 1 July). Minimize disturbance of seals with pups in the water by remaining at least 330 feet (100 meters) away from parturient seals. (Note: These distances are derived from a study in a park where hunting is prohibited and access is restricted and where viewing seals is encouraged. These distances may be too liberal and may need to be enlarged in situations where access and

hunting are not controlled and where seals would be expected to be more reactive to boat traffic.)

- \* Minimize disturbance effects of boat traffic: for molting harbor seals, remain 0.5 mile (800 meters) away from haulouts where seals are molting; for Steller sea lions, remain at least .5 mile (800 meters) away from haulouts and rookeries; for sea otters, avoid known feeding and resting concentration areas, especially following prolonged stormy periods when sea otters have been unable to feed.
  - \* Individuals associated with Forest Service permitted or approved activities will not intentionally approach within 100 yards, or otherwise intentionally disturb or displace any hauled-out marine mammal.
3. Cooperate with State and other Federal agencies to develop sites and opportunities for the safe viewing and observation of marine mammals by the public. Maintain a public education program explaining Forest management activities related to marine mammals in cooperation with State and other Federal agencies. Signs will be posted in logging camps and at public launches in the Project Area to describe legal restrictions and to educate and discourage the public from harassing marine mammals.

No direct effects on sea lions from forest management activities are anticipated. Compliance with these standards and guidelines will result in no anticipated adverse effects on sea lion populations or their habitats through any of the alternatives.

## **AMERICAN PEREGRINE FALCON (*Falco peregrinus anatum*)**

### **Distribution and Population**

The American peregrine falcon is primarily associated with interior Alaska for breeding, nesting and rearing of young. The falcon is highly migratory, wintering as far south as northern Argentina and occurring in Southeast Alaska only during migration periods (Ambrose et al. 1988). Population numbers have increased three-fold in Alaska (ADF&G letter Feb. 6, 1987, Ambrose, et al., 1988, minutes of Interagency Wildlife Technical Committee Meeting of March 29, 1991). The USFWS has recently (October 5, 1994) down-listed the species from endangered to threatened.

### **Effects of Polk Inlet Proposed Action on Population or Habitat**

The American peregrine falcon occurs in Southeast Alaska only during migration. The primary reason for past declines in peregrine falcon populations was the proliferation of organochlorine pesticides, especially DDT and its principal metabolite DDE (Cade et al. 1971; Peskall and Kiff 1979; USFWS 1982). No organochlorine pesticides are authorized for use on the Tongass National Forest.

During migration through Southeast Alaska, the availability and abundance of prey species is most likely the primary factor affecting peregrine falcons. In coastal areas of Washington, the primary prey species for peregrine falcons were shorebirds and waterfowl species; passerine birds were also identified in the diet (Anderson and Debruyne 1979; Anderson et al. 1980). It is assumed that food sources would be similar for coastal Alaska. Peregrines forage over open sites such as bodies of water, marshes, grasslands, and shorelines, as well as above wooded areas.

Peregrines attack flying prey from above or chase them. Although they forage over wide areas, they also have preferred foraging sites (White 1974).

Actual migration routes and patterns, and foraging areas, have not been identified for this subspecies of peregrine in Southeast Alaska, but could include large water bodies in and around the Polk Inlet Project Area. Forest-wide standards and guidelines have been developed for protecting seabird rookeries and waterfowl concentration areas (pages 4-102 to 4-104 in Forest Service 1991b) and have been adopted by the Polk Inlet FEIS. A wide variety of passerine (perching and song) birds will continue to be available from numerous open and forested communities under all alternatives associated with the Polk Inlet Project.

No adverse effects on peregrine falcon populations or their habitats are anticipated with any forest management activities under any of the alternatives.

The Peale's subspecies of the peregrine falcon (*F. p. pealei*) nests on the outer islands west of the Project Area (Schempf 1981, 1982). This species is not listed as endangered or threatened, but is covered by a provision of the "similarity of appearance" which broadens the scope of the protection for all peregrine falcons. The nest distribution of this subspecies is closely associated with large seabird colonies, and seabirds are believed to be the major prey of the falcon. No harvest units for any of the alternatives are within 5 miles of any known nest sites of Peale's peregrine falcon and no effects are anticipated.

## **ALEUTIAN CANADA GOOSE (*Branta canadensis leucopareia*)**

### **Distribution and Population**

The breeding, nesting, and rearing of young Aleutian Canada geese occurs primarily at the Aleutian Islands. The Aleutian Canada goose winters in western Oregon, and in northwestern and central California. Although their movements within Alaska are not well known, the Aleutian Canada goose may occur in Southeast Alaska during migration. Population numbers in Alaska are increasing, and the USFWS is considering removing the species from the threatened list.

### **Effects of Polk Inlet Proposed Action on Population or Habitat**

The Aleutian Canada goose is not primarily associated with Southeast Alaska. Although migration patterns in Alaska are not well known, Aleutian Canada geese may occur in Southeast Alaska as migrants. Due to the limited use, if any, of the Project Area by Aleutian Canada geese, no adverse effects on their population by any of the alternatives is anticipated.



## **ESKIMO CURLEW (*Numenius borealis*)**

### **Distribution and Population**

The Eskimo curlew is primarily associated with western and northern Alaska. The Eskimo curlew is rare and not typically found in Southeast Alaska, but it may occur as a migrant.

### **Effects of Polk Inlet Proposed Action on Population or Habitat**

Due to the limited use of the Project Area by the Eskimo curlew, no adverse effects on their population by any of the alternatives is anticipated.

### III. CANDIDATE SPECIES ASSESSMENTS

#### ALEXANDER ARCHIPELAGO WOLF (*Canis lupus ligoni*)

##### Taxonomic Status and Range

The Alexander Archipelago wolf is a small subspecies of the gray wolf (Goldman 1937, Pedersen 1982), similar in appearance to the Vancouver Island wolf (*C. l. crassodon*). Kirchhoff (1992) described the Alexander Archipelago wolf as occurring on the Southeast Alaska mainland and all large islands in Southeast Alaska except for Admiralty, Baranof, and Chichagof.

On December 17, 1993, the USFWS received a petition from the Biodiversity Legal Foundation to list the Alexander Archipelago wolf of Southeast Alaska as threatened pursuant to the Endangered Species Act. On May 13, 1994, the USFWS found that the petitioners had presented substantial information indicating that listing may be warranted and a status review of the species was initiated. On February 16, 1995, the USFWS found that there was not enough scientific evidence to warrant the listing.

The primary food of most Southeast Alaskan wolves is deer (Wood 1990, Person 1993). Beaver, mountain goat, and moose are also primary prey in some mainland areas and spawning salmon are fed on when available (Wood 1990). Alexander Archipelago wolf abundance is likely linked to deer abundance and availability, particularly in southern island habitats (Suring et al. 1988, Wood 1990, Person 1993).

Based on field observations, discussions with trappers and anecdotal information, the wolf population in Southeast Alaska is estimated to be 635 to 690 individuals, distributed in 85 packs (Morgan 1990). However, Person (pers. comm. 1994, as cited in USFWS letter) estimates that the current Southeast Alaska population is 1,000 individuals and that 30-40 percent of them occupy Prince of Wales Island. A large pack of approximately 13 animals occupies the area around the West Arm of Cholmondeley Sound (both north and south sides) and at least one pack apparently occupies the Old Franks/Twelvemile Arm area (Person, pers. comm. 1994). Other packs may use other parts of the Project Area, including the Harris River/Maybeso Watershed area and the area east of McKenzie Inlet.

Many studies have shown that wolf abundance may be correlated with road density (Thiel 1985, Jensen et al. 1986, Mech et al. 1988, Fuller 1989). In one study, wolves generally were not present where the density of roads used by humans exceeded 0.93 mi/sq mi (0.58 km/sq km) (Mech et al. 1988). However, other work has suggested that wolves could exist in areas with higher road densities if these areas were adjacent to roadless areas (Mech et al. 1988). The primary threat of high road densities is the increased access to humans who kill wolves by shooting, snaring, or trapping (Van Ballenberghe et al. 1975, Mech 1977).

Based on application of the Tongass Habitat Capability Model for the gray wolf (see Polk Inlet FEIS), habitat capability declined by about 27% in the Project Area between pre-logging and existing conditions. This decline is directly related to a reduction in deer habitat capability associated with conversion of old-growth forest to young second growth. Accompanying this decline has been an increase in road density associated with logging activities. Road density

under existing conditions is approximately 0.73 mi/sq mi across the Project Area. Increases in road density may result in a higher wolf harvest rate due to the increased accessibility of the Project Area.

### **Effects of Polk Inlet Proposed Action on Population or Habitat**

Implementation of one of the Polk Inlet Project action alternatives will result in a reduction in deer habitat capability. Wolf habitat capability is predicted to be reduced in proportion to the reduction in deer habitat capability. The wolf habitat capability reduction is predicted to range from 1.8 percent for Alternative F5 to 2.6 percent for the other alternatives.

Road density will also increase in the Project Area as a result of implementation of one of the action alternatives. Total road density would range from 0.84 mi/sq mi, after implementation of Alternative F5, to 0.91 mi/sq mi, after implementation of Alternative 3. However, the effect of increased road density would be substantially mitigated by access management. Closure of the road into the Indian Creek drainage and the road into Old Franks Lakes and beyond (see Final EIS), will reduce the negative effects associated with new roads over the long-term. Access management on most other roads constructed under the Polk Inlet Project would be at the "discourage level" (i.e., alder would be allowed to grow and blowdown would not be removed).

Because of the reduction in deer habitat capability and the increase in road density associated with implementation of one of the action alternatives, the Polk Inlet Project may affect the Alexander Archipelago wolf. However, the effects of this project are not expected to be substantial, especially for Alternatives F2 and F5 which do not involve extensive roading into previously unroaded areas.

Under Alternative P of the TLMP Draft Revision (1991b), long-term cumulative effects on the wolf in the Project Area would be substantial. With the assumption that all suitable-available timber would be harvested, wolf habitat capability is expected to drop to 5.2 wolves, which is a 67 percent reduction from 1954 conditions (see Final EIS). Corresponding increases in road construction would also occur and could result in further increases in wolf harvest rate. For these reasons, the long-term viability of the wolf in the Project Area would be in question. The TLMP Revision Team is currently developing a new draft forest plan which will incorporate an old-growth retention strategy. For the Polk Inlet Project, two retention strategies have been identified: one associated with Alternative F2 and one associated with Alternative F5 (see Final EIS). Under these retention strategies, long-term effects of timber harvesting on wolves in the Project Area would be substantially reduced.

### **PRINCE OF WALES FLYING SQUIRREL (*Glaucomys sabrinus griseifrons*)**

#### **Distribution and Population**

The Prince of Wales flying squirrel is endemic to Prince of Wales Island. Fay (1985) suggested that a taxonomic re-evaluation is needed for the Prince of Wales flying squirrel. Howell described the flying squirrel as unknown and "scarce on the Island" (Howell 1934). In contrast to Howell's 1934 account, results from a survey of local trappers indicated that the squirrel is present in substantial numbers and is distributed across at least the northern third of the island (USFWS Memorandum, June 5, 1987).



The home range of flying squirrels is about 1.6 hectares (about 4 acres). Population densities range from 2 to 5 per hectare. Flying squirrels usually have one litter of young per year; litter size ranges from 1 to 6. Their habitat includes a forest providing adequate denning sites and feeding areas. Denning sites include tree cavities and "witches brooms." Forage includes fungi, berries, and lichens (Interagency Task Group meeting records, July 18, Sept. 1 and 8, 1988).

Noble and Harrington (1978) examined the density of snags in the mature forest on Prince of Wales Island and found that snags were present at densities of up to 60 per acre; this snag density exceeds recommended flying squirrel habitat requirements (USFWS Memorandum, June 5, 1987; Interagency Task Group meeting records, July 18, Sept. 1 and 8, 1988).

Habitat use by flying squirrels is related to the size of its preferred habitats (July 31 and August 1, 1989 interagency workshop). Optimum use occurs when patches of preferred habitat are greater than 300 acres. Use declines with decreasing patch size, reaching zero when patches are smaller than 25 acres.

In a June 5, 1987 memorandum, the U.S. Fish and Wildlife Service recommended changing the Prince of Wales flying squirrel from a category 2 candidate species to a category 3 candidate species. This recommendation was based on the following information on the Prince of Wales flying squirrel:

"The squirrel is known to be largely dependent on old-growth forest for both nesting and foraging habitat. Current estimates of old-growth harvesting on Prince of Wales Island indicate that enough old growth will remain for populations of flying squirrels. Noble and Harrington (1978) examined the density of snags in the mature forest on Prince of Wales Island and found that snags were present at densities up to 60 per acre -- far in excess of flying squirrel habitat requirements. The squirrel is also apparently coexisting in healthy numbers with introduced marten on the island."

An Interagency Task Group evaluated the habitat requirements for flying squirrels and determined that habitat needed to maintain viable populations exists on Prince of Wales Island (ref.: Interagency Task Group meeting records, July 18, Sept. 1 and 8, 1988).

Prince of Wales Island is within two ecological provinces: North Prince of Wales (#14) and Southern Prince of Wales (#18). The TLMP SDEIS displays the amount of old growth within these provinces in designated Wilderness and Legislated LUD II areas (Forest Service 1991b, p. 3-309). Reported densities of flying squirrels range from 2 to 5 per hectare (0.8 to 2 per acre). The Wilderness Areas and Legislated LUD II Areas on Prince of Wales Island are estimated to provide habitat capability ranging from 83,000 to 208,000 squirrels (low range based on 0.8 squirrels per acre for all productive old growth; high range based on 2 squirrels per acre for all productive old growth).

In addition to the Wilderness Areas and Legislated LUD II Areas, the riparian areas will be managed according to the Stream and Lake Protection Management Prescription. There will also be both productive and unproductive old growth in various patch sizes between these areas. Compliance with forest-wide biological diversity standards and guidelines for old growth and forest-wide snag/cavity nesting standards and guidelines will maintain important habitat

components for flying squirrels (Forest Service 1991b, pages 4-3 to 4-7, and 4-104 to 4-105) and have been adopted by the Polk Inlet Project.

#### **Effects of Polk Inlet Proposed Action on Population or Habitat**

Since timber harvest will be removing and fragmenting flying squirrel habitat, the Polk Inlet Project may affect the Prince of Wales flying squirrel. Even so, if the above habitat capability estimates are accurate, the viability of the flying squirrel is still assured.

### **ARCTIC PEREGRINE FALCON (*Falco peregrinus tundris*)**

#### **Distribution and Population**

The Arctic peregrine falcon is primarily associated with the area north of the Brooks Range and Seward Peninsula; it is highly migratory, wintering as far south as northern Argentina (Ambrose et al. 1988). It occurs in Southeast Alaska only during migration periods. Population numbers have increased three-fold in Alaska (ADF&G letter Feb. 6, 1987; Ambrose et al. 1988; minutes of Interagency Wildlife Technical Committee Meeting of March 20, 1991). Effective November 4, 1994, the USFWS removed the species from the threatened list. It now has the status of a category 2 candidate species.

#### **Effects of Polk Inlet Proposed Action on Population or Habitat**

As described for the American peregrine falcon (see above), no effects on the population or habitat of the Arctic peregrine falcon are anticipated due to the Polk Inlet Project action alternatives.

### **MARBLED MURRELET (*Brachyramphus marmoratus*)**

The marbled murrelet is a small seabird that belongs to the family Alcidae. It occurs throughout the North Pacific. The Asian subspecies (*B. m. perdix*) ranges from the Sea of Okhotsk, Kamchatka and Commander Islands, south to Korea, Japan and the Kurile Islands. The North American subspecies (*B. m. marmoratus*) ranges from the Aleutian Archipelago in Alaska, eastward to Cook Inlet, Kodiak Island, Kenai Peninsula, and Prince William Sound, southward coastally throughout the Alexander Archipelago of Alaska and through British Columbia, Washington, Oregon to central California, with individuals wintering as far south as southern California (Marshall 1988, USFWS 1992). The species feeds below the water's surface on small fish and invertebrates in near-shore marine waters (Marshall 1988, USFWS 1992).

Marbled murrelets nest on land or in trees and lay only one egg per clutch. They are thought to be semi-colonial in their nesting habitats, as nesting marbled murrelets are often aggregated (USFWS 1992). Alaska is the only state where marbled murrelets are known to nest on the ground in treeless areas. At least 18 ground nests have been identified with certainty as of 1994, based on sightings of the incubating bird (Mendenhall 1992; pers. comm., K. Nelson, Oregon Coop. Wildl. Res. Unit, Corvallis, January 24, 1995). Through 1994, a minimum of 73 tree nests have been located in North America (26 in Oregon, 6 in Washington, 11 in California, 11 in British Columbia, and 19 in Alaska)(pers. comm., K. Nelson, 1994). Of 47 nests found in



Washington, Oregon, California, and British Columbia where data were available, all were located in old-growth trees that ranged in diameter-at-breast height (dbh) from 35 to 210 inches (88-533 cm). Nest trees in Alaska ranged in dbh from 12 to 41 inches (30-104 cm) (pers. comm., K. Nelson, 1994). Nests are usually located high above the ground and have good overhead protection (USFWS 1992). Both male and female marbled murrelets incubate eggs: one bird stays at the nest for 24 hours, while the other feeds on the ocean. After hatching their young, the adults stay at the nest with the young bird for only about four days. The young bird is then left alone in the nest, except when the adults return to the nest to feed it (Interagency Meeting Records June 12, 1989).

Except for the fall period when they are molting, flightless, and stay on the ocean, birds have been known to fly to tree stands every month of the year. In Washington, birds have been recorded up to 50 miles inland (Hamer and Cummins 1991, in USFWS 1992).

**Overview of work in Alaska.** An upland study of marbled murrelets on Naked Island in Prince William Sound is ongoing. In the study area, murrelets flew most frequently into two areas with steep slopes facing west, characterized by 70-80 percent cover of hemlock old growth. A review of the small 1991 sample suggested greater murrelet use of inland areas at the heads of bays as opposed to the outer peninsulas. Slopes facing northeast, west or southwest may be used more frequently than slopes facing north, northeast or southeast on Naked Island (Kuletz 1991).

Marbled murrelets are common along the coast of the Project Area. Adult and subadult murrelets have been frequently observed foraging in inlets and coves of the Project Area, particularly along Twelvemile Arm, Polk Inlet, Cholmondeley Sound, and Clarence Straits (pers. comm., L. Kvaalen, Craig Ranger District, October 5, 1992). Boat transect surveys were conducted along the shoreline of logged and unlogged areas in Southeast Alaska by the Craig and Misty Fiords Ranger Districts in 1991; these surveys counted 7.5 to 10 marbled murrelets per kilometer traveled parallel to the shoreline in transects 200 meters wide. Assuming that marbled murrelets along the Polk Inlet coast nest within the Polk Inlet Project Area, and assuming a conservative estimate of 7 marbled murrelets per kilometer of shoreline, the Polk Inlet Project Area (295 km of shoreline) might provide habitat for 2,000 marbled murrelets. This figure may be low because the Craig and Misty survey figures were for 200-meter wide transects, not for all distances out from the shoreline. This estimate assumes that the figure from the Craig vicinity can be extrapolated to Polk Inlet and that birds nest in the general vicinity of where they are seen at sea.

In 1984 during a marbled murrelet research project conducted by the ADF&G, a tree nest was found on Baranof Island. This nest was on a large horizontal limb, 82 feet up in a mountain hemlock tree. In 1989, two more tree nests were found in California. Both nests were in large Douglas-fir trees, on large horizontal limbs, and were watched 24 hours a day. A newly hatched bird at one of these nests was carried off by a raven (Interagency Meeting Records, June 12, 1989). Thorne Bay Ranger District personnel collected data on a nesting stand on Prince of Wales Island in 1990. An occupied marbled murrelet ground nest was found in 1992 in Thorne Bay Ranger District and stand data were collected in association with this sighting.

During Polk Inlet field verification studies in 1992, interdisciplinary teams visited all potential harvest units. Marbled murrelet eggshell fragments were observed in three units: in Unit 621-299 on the east ridge of Twelvemile Arm; in Unit 621-254 on the west ridge Twelvemile Arm;



and in Unit 613-202 in the Old Franks drainage. After further investigation, a marbled murrelet nest with eggshell fragments was discovered and photographed at the site in Unit 621-299. During other 1992 field verification studies, a nestling marbled murrelet was found on the road at the east end of Neck Lake and another young marbled murrelet was seen on the ground north of El Capitan on northern Prince of Wales Island.

In 1993, marbled murrelet surveys were conducted at dawn in 29 potential harvest units in the Control Lake Project Area, just north of the Polk Inlet Project Area. Murrelet activity was recorded in 97 percent of the harvest units sampled and occupancy behavior was noted in 38 percent of them based on one survey (unpublished data). These studies and observations indicate that the marbled murrelet is relatively abundant on Prince of Wales Island and suggest that the estimate of 2,000 birds in the Polk Inlet Project Area may be reasonable.

Old-growth removal is not the only factor which may influence marbled murrelet populations; other known factors include oil spills, predation, and commercial fishing (murrelets are caught in fishing nets). Piatt and Ford (1993) estimated that the marbled murrelet population on the Alexander Archipelago numbered about 96,200 birds based on surveys at sea during the 1970's and 1980's. They estimated the entire Alaskan breeding population at 153,030 birds. Mendenhall (1992) estimated that the marbled murrelet population for Southeast Alaska ranged from 75,000 to 150,000 during the summer, based on surveys by M. McAllister from 1981-1988.

#### **Effects of Polk Inlet Proposed Action on Population or Habitat**

Three nesting locations for marbled murrelets have been identified in potential harvest units within the Project Area; these include one nest site and two locations where eggshell fragments were observed. Harvest unit boundaries of these units were modified to provide for a 30-acre no-cut buffer around the nesting locations to preserve nests as proposed in guidelines presented by the TLMP Revision Team (S. Brink, TLMP Revision Team, October 27, 1992). This buffer size designation is based on the rationale of studies indicating that a horizontal distance equal to 4-5 tree heights from a known nest site providing reasonable cover should maintain microclimatic conditions in and around the nest site. Furthermore, the 30-acre no-cut buffers proposed for the Project are not isolated stands but are contiguous with much larger tracts of suitable nesting habitat. Draft 1991 Interim Management Guidelines For Marbled Murrelet Habitat Conservation in Washington, Oregon and California (where the marbled murrelet is listed as threatened) call for maintaining all contiguous suitable habitat in stands less than 480 acres where murrelet occupancy during the breeding season is demonstrated. However, the marbled murrelet in Alaska is not a threatened species, is much more abundant than in the contiguous states, and its potential nesting habitat is abundant and widespread; thus, the latter guidelines do not appear warranted for marbled murrelets in Alaska.

Since all inland forest stands on the Tongass National Forest are less than 25 miles from salt water, all provide potential marbled murrelet nesting habitat (USFWS 1992). However, in California these birds more commonly occupy larger stands (greater than 500 acres) than smaller stands (less than 100 acres), and are usually absent from stands less than 60 acres in size (Paton and Ralph 1988, Ralph et al. 1990). Without precise knowledge to delineate the differences, all old-growth habitat greater than 8 MBF/acre is assumed to be suitable for nesting.

All action alternatives will harvest stands that may be capable of providing nesting habitat (old-growth forests) for marbled murrelets. Table 2 shows that each action alternative harvests 4 to 6 percent of the old-growth habitat in the Project Area, leaving at least 63,907 acres of old growth unharvested.

In areas with timber harvesting, the amount of nesting habitat for marbled murrelets will be reduced. The amount of old growth currently being used by marbled murrelets is unknown. The factors currently limiting marbled murrelets in Southeast Alaska have not been identified. Due to the number of unknowns associated with marbled murrelets, it is not known what the actual effects of timber harvest will be, other than the total amount of habitat will be reduced. Fragmentation or increased edge effects may also reduce habitat suitability.

If the current population assumptions are correct, and if it is assumed that nesting habitat is the limiting factor for the population, then a reduction in nesting habitat may have a proportional effect on the population. If so, then even after a 4 to 6 percent reduction in potential nesting habitat (Table 2), the Polk Inlet Project Area would still support 1,900 or more birds. This assumes no influence caused by fragmentation or increased edge, and a uniform use of the available, suitable habitat.

**Table 2. Acres and percent of old growth (volume class 4-7) habitats proposed for harvest (including acres cleared for road ROW), by alternative.**

Habitat	Existing Acres	Alt. 1a		Alt. 1		Alt. F2		Alt. 3		Alt. 4		Alt. F5	
		Acres Cut	% Chg	Acres Cut	% Chg	Acres Cut	% Chg	Acres Cut	% Chg	Acres Cut	% Chg	Acres Cut	% Chg
Old Growth	68,085	-2,328	-3.4	0	0	3,420	5.0	4,178	6.1	3,720	5.5	2,894	4.3

A measure of the effect of fragmentation on murrelet habitat can be obtained by calculating a patch size effectiveness (PSE) index for the Project Area based on a PSE curve developed specifically for the marbled murrelet at an interagency workshop (held at Juneau, Alaska, 1989). This curve assigns an effectiveness index value of 0 to old-growth patch sizes less than 70 acres in size and a value of 1.0 to patches greater than 600 acres in size. Intermediate values at curve inflection points include: 0.1 for patches of 100 acres, 0.5 for patches of 250 acres, and 0.9 for patches of 500 acres. Based on this curve and the frequency of patch sizes in the Project Area, the average PSE values shown in Table 3 were calculated.



**Table 3. Average patch size effectiveness (PSE) indexes for the marbled murrelet in the Project Area by alternative.**

	1954	Alt 1a 1994	Alt 1 1995	Alt F2 1998	Alt 3 1998	Alt 4 1998	Alt F5 1998
PSE Index for Marbled Murrelet	.951	.902	.894	.874	.871	.875	.874

It can be seen that the change in PSE from existing conditions would be on the order of 2 percent with any of the action alternatives. This is not considered a substantial change.

However, over the long-term, if all suitable-available timber under Alternative P of the TLMP Draft Revision (1991b) were to be harvested, the PSE would drop to 0.712, which is 20 percent less than existing conditions. Further, the amount of old-growth available would be reduced to approximately 17,815 acres, which is a 74 percent reduction from existing conditions. In this situation, a substantial reduction in marbled murrelet numbers is predicted for the Polk Inlet Project Area. The TLMP Revision Team is currently developing a new draft forest plan which will incorporate an old-growth retention strategy. For the Polk Inlet Project, two retention strategies have been identified -- one associated with Alternative F2 and one associated with Alternative F5 (see Final EIS). Under these retention strategies, long-term effects of timber harvest on marbled murrelets in the Project Area would be substantially reduced.

In summary, the Polk Inlet Project may affect marbled murrelets. The extent of the effect due to the Project is expected to be minimal. However, over the long-term, a significant reduction of murrelet numbers is possible; this reduction could be minimized with implementation of a long-term old-growth retention strategy.

Murrelet nests are exceedingly difficult to find, and no intensive nest searches in Polk Inlet units are planned. However, if any nests are discovered, they will be protected by a 30-acre buffer to maintain microclimatic conditions around the nest tree as proposed in the Polk Inlet FEIS. If research, monitoring, or administrative studies uncover new information addressing murrelets in Southeast Alaska, they will be reviewed for use in and/or replacement of this guideline.

#### **KITTLITZ'S MURRELET (*Brachyramphus brevirostris*)**

Kittlitz's murrelet is a small seabird belonging to the Alcidae family. Information is limited on the natural history of this species. Kittlitz's murrelet is distributed near glacial waters from Pt. Barrow south to at least Glacier Bay, most commonly from Cape Prince of Wales south to Glacier Bay from spring through fall (Robbins et al. 1983, Peterson 1990). Winters are spent feeding in offshore pelagic waters. Kittlitz's murrelet forages on crustaceans in inshore marine waters during the breeding and nesting season in Alaska. Nests are generally located inland on the ground above the timberline in coastal mountains at the base of north-facing slopes. Nesting may also occur on unvegetated glacial moraines, grassy ledges of island sea cliffs, and barren ground on coasts (Ehrlich et al. 1988). One egg per clutch is laid on the bare ground amid lichen-covered rocks. Young Kittlitz's murrelets born at inland nests are believed to swim down streams to reach the sea.



The Project Area is beyond the known southern distribution limits of the Kittlitz's murrelet. Thus, it is very unlikely that Kittlitz's murrelet would occur in the Project Area (pers. comm., Nancy Naslund, Wildlife Biologist, USFWS, Anchorage, December 16, 1994). Even if this species were to occur in the Project Area, it is not known to nest in forested habitat affected by the Project, preferring barren ground above the timberline. Thus, there are no effects anticipated to Kittlitz's murrelet from Polk Inlet timber harvest activities.

## **QUEEN CHARLOTTE GOSHAWK (*Accipiter gentilis laingi*)**

### **Distribution and Population**

The American Ornithologists Union (AOU) recognizes two subspecies of the northern goshawk, *Accipiter gentilis atricapillus* and *A.g. laingi*, the Queen Charlotte goshawk (AOU 1957). Taverner (1940) first described the darker-plumaged Queen Charlotte goshawk as a distinct race occurring in the coastal temperate rainforests of the Queen Charlotte Islands and Vancouver Island, British Columbia. Webster (1988) found that the Queen Charlotte goshawk occurred from Vancouver Island north to the Taku River near Juneau. The northern goshawk is identified as a category 2 candidate species throughout its range.

On May 9, 1994, the USFWS received a petition from the Southwest Center for Biological Diversity and numerous copetitioners, to list the Queen Charlotte goshawk as endangered pursuant to the Endangered Species Act. On August 19, 1994, the USFWS found that the information presented by the petitioners together with the information in USFWS files was substantial and indicated that listing may be warranted. Therefore, a status review of the species was initiated. A decision has not been reached as of the date of this document.

The goshawk is a wide-ranging forest raptor that generally occurs in low densities, from 2.4 pairs (Central Alaska, McGowan 1975) to 11.0 pairs (Arizona, Crocker-Bedford and Cheney 1988) per 100 square kilometers, although population densities in Southeast Alaska may be much lower (Crocker-Bedford 1992). The most recent estimates of the goshawk population in Southeast Alaska range from 100 to 381 pairs (USDA Forest Service 1991a; Crocker-Bedford 1994) to 100 to 800 pairs (Alaska Interagency Goshawk Committee, Report of June 30, 1994).

As of December, 1991, the Alaska Region Status Report for USDA Region 10 Sensitive Species Consideration, stated: "The two factors causing concern for the goshawk in Southeast Alaska are: low current population numbers and potential declines in habitat capability. Both factors expose the Queen Charlotte Goshawk to increased susceptibility to local or widespread extirpation. A review of goshawk observations during the past decade has revealed 16 confirmed or probable nesting sites in Southeast Alaska." A high association was found between goshawk nesting stands and higher volume, tree-sized stands; 8 of the 16 sites were clearcut or planned for timber harvest until the goshawk nests were found (Iverson unpubl. rep.). This relationship has also been established in other parts of the goshawk's range. Recent results of studies within the range of the Queen Charlotte goshawk (ADF&G 1993, Titus et al. 1994), indicated a greater frequency of relocations of radio-tagged goshawks in mature and old-growth forest. Of 18 nest trees for which habitat attributes were characterized, 16 were in old-growth trees and two were in second-growth trees greater than 90 years of age. Of 661 radio relocations, over 90% were

in habitat classified as volume class 4 or greater and 68% were in habitats classified as volume class 5 or greater (Titus et al. 1994).

Home ranges have been reported to be 2,000 to 3,200 hectares (Reynolds 1983). These home ranges may include a mosaic of habitat types, with a strong preference for mature forest with flight space beneath the canopy (Reynolds 1989, USDA Forest Service 1990). Home range size is strongly dependent upon quality of the foraging habitat and prey availability (Kenward 1982). Titus et al. (1994) reported breeding period home ranges for 16 adult goshawks in Southeast Alaska as large as 19,613 hectares and year-round home ranges as large as 114,728 hectares.

A recent review of the Queen Charlotte goshawk summarized habitat use as follows (Crocker-Bedford 1994):

"Analyses of habitat use have shown similar results throughout the geographical range of the northern goshawk in the United States. Home ranges include stands of large trees for nesting, as well as for greater abundance of some prey. The higher canopy provided by large trees, along with sparser than normal shrubs and small trees, appears to facilitate goshawk flight and prey capture. Closed canopies appear to provide preferred microclimate in the nesting stand, increased productivity of some important prey species, and reduced competition and predation by open-forest raptors. A literature review indicated that goshawk densities tend to decrease with amount of timber harvest, and that goshawks may sometimes be impacted by forest fragmentation. In Southeast Alaska 92 percent of the relocations on radio-tagged goshawks were in old-growth forests having over 8 mbf/ac. Old-growth having over 20 mbf/ac was most preferred."

Goshawks generally select forest stands with large trees on gentle slopes at low elevations for nesting and foraging (Reynolds 1989, USDA Forest Service 1990). Foraging habitat is generally characterized by a greater diversity of forest age classes and structural characteristics (e.g., snags, woody debris) than nesting areas; foraging areas also comprise the largest percentage of goshawk home ranges (Reynolds et al. 1991). Goshawks feed primarily on ground-dwelling birds and small mammals.

Goshawk sensitivity to timber harvest has resulted in management recommendations to protect nest site integrity (USDA Forest Service 1990, USDA Forest Service 1991a, USDA Forest Service Alaska Region 1992, USDA Forest Service 1994). Other management recommendations recognized the importance of the foraging area within the post-fledging area (Crocker-Bedford 1990, USDA Forest Service 1991, and USDA Forest Service Alaska Region 1992). There is now widespread recognition of the importance of most foraging habitat, including areas far from the nesting site (Reynolds 1989, USDA Forest Service 1990, Crocker-Bedford 1990, Crocker-Bedford 1991, Crocker-Bedford 1992, USDA Forest Service 1992, Marshall 1992).

Twenty-one goshawk nest areas were documented in Southeast Alaska with activity between 1990 and 1993 (Titus et al. 1994). At least one nest site was located at 18 of these areas, including 8 active nests in 1993. In 1994, a total of 33 historic and current sites with at least one nest were documented; active nests were located at 21 of these sites (ADF&G 1994). Goshawk nesting has not been confirmed within the Polk Inlet Project Area.

Field verification surveys of all potential Polk Inlet harvest units were conducted in 1992 by Ebasco Environmental (now Foster Wheeler Environmental Corporation) and subcontractor



personnel. These efforts resulted in two possible observations of goshawks in the Old Franks drainage. Neither observation was associated with a particular harvest unit. Goshawk surveys, utilizing the Alaska Region goshawk survey protocol, were conducted in the Polk Inlet Project Area in 1993 by Forest Service personnel (Kvaalen and Iverson 1994). A total of 800 stations were surveyed during the nesting and fledgling period covering 20,000 acres. Six possible detections and no definite detections were recorded. No nest sites were identified. In 1994, the Forest Service surveyed or resurveyed 178 stations covering 4,450 acres: 2 possible and 1 confirmed goshawk were detected in Old Franks drainage. The confirmed observation was in Unit 613-109 from the 1989-94 Long-term Sale on August 3, 1994 (Knotts 1994). Despite several more visits to the vicinity, no further responses were detected.

### **Effects of Polk Inlet Proposed Action on Population or Habitat**

None of the alternatives proposes timber harvest of known nest areas or designated post fledging areas. Goshawks have been seen in the Old Franks drainage during the breeding season, but the extent of overlap between this goshawk home range and the Polk Inlet harvest units is unknown. Alternatives F2 and F5 would result in the least amount of harvest in this drainage and its vicinity.

The Forest Service has recently prepared Interim Habitat Management Guidelines for Maintaining Well-Distributed Viable Wildlife Populations within the Tongass National Forest (USDA Forest Service 1994). These guidelines include an extensive Habitat Conservation Area (HCA) strategy consisting of large and medium HCA's and a protection strategy for goshawk home ranges associated with all identified nests. Alternatives F2 and F5 fully comply with these Interim Habitat Guidelines. These two alternatives are associated with Project-specific old-growth retention strategies developed for the Polk Inlet Project (see Polk Inlet FEIS). However, because the Polk Inlet Project proposes additional harvest in old growth, including the Old Franks drainage where goshawks have actually been observed, we conclude that the Project may affect the Queen Charlotte goshawk. Because of the old-growth conservation strategies incorporated into Alternatives F2 and F5, significant effects are not expected under these alternatives. Alternative 3 may significantly affect goshawks, because of the extent of harvest in the Old Franks drainage. Alternative 4 would result in greater effects than Alternatives F2 and F5 due to the associated greater amount of entry into relatively unfragmented areas.

In the long-term, with implementation of Alternative P of the Supplement to the TLMP Draft Revision (1991b), old-growth habitat in the Project Area would be reduced from 68,085 acres under existing conditions to 17,815 acres (sometime after 2054). Further, the three old-growth blocks greater than 5,000 acres in size currently existing within the Project Area would be eliminated. In this situation, a substantial reduction in goshawk habitat capability is predicted for the Polk Inlet Project Area. The TLMP Revision Team is currently developing a new draft forest plan which will incorporate an old-growth retention strategy. For the Polk Inlet Project, two retention strategies have been identified -- one associated with Alternative F2 and one associated with Alternative F5 (see Final EIS). Under these retention strategies, long-term effects of timber harvest on the Queen Charlotte goshawk in the Project Area would be substantially reduced.

Any pairs of goshawks not discovered prior to timber harvest may be affected if the harvest unit corresponds to key stands of habitat. Studies of goshawk nest sites in Idaho indicated that timber harvesting within 0.25 mile (0.4 km) of nest sites resulted in a 75 to 80 percent reduction



in occupancy of their nesting territories (Patla 1990). Any goshawk nest found prior to harvest will be protected utilizing the goshawk management guidelines in effect at that time.

## **HARLEQUIN DUCK (*Histrionicus histrionicus*)**

### **Distribution and Population**

The harlequin duck's range is divided into two separate and distinct regions: eastern and western. The eastern range embraces Iceland, parts of Greenland, and Labrador, with the winter range extending as far south as New Jersey. The western range includes northeast Siberia west to the Lena River, east to the Kamchatka Peninsula and the Commander Islands and north to the Arctic Circle, then across the Bering Sea to the Aleutian Islands, much of interior Alaska, and south to northwest Wyoming and central California (Bellrose 1976). In Alaska, the harlequin duck has been reported as a fairly common year-round resident, and at one season or another, has been recorded over much of the State except the Arctic coast (Gabrielson and Lincoln 1959).

Available evidence indicates that the species breeds locally over much of southern Alaska, probably the Aleutians, and north to Anaktuvuk Pass. All ornithologists who have worked during the spring and summer months in the Alexander Archipelago and other parts of Southeast Alaska have commented upon the numbers of these ducks, frequently summarizing their observations by stating that they were common or abundant (Gabrielson and Lincoln 1959).

Harlequins nest along inland fast-moving rivers and streams, usually within 6 feet (but up to 60 feet) of water (DeGraaf et al. 1991). The nest site generally has shelter overhead: a recess in a stream bank or among rocks, or under shrubs, trees, or stranded debris. Occasionally the nest is in an open area or even on a stream bar, but under shrubbery or other low vegetation. There is no proof that harlequins nest in tree cavities (Bellrose 1976; Armstrong et al. 1983; Godfrey 1979; Palmer 1975). During the winter the harlequin duck is common to abundant in the coastal waters of Southeast Alaska, Prince William Sound, Cook Inlet, the bays of the Alaska Peninsula, the Aleutians and the Pribilofs (Gabrielson and Lincoln 1959). Preferred winter habitat is reported to be areas along surf-pounded rocky coasts rather than sheltered bays and fjords where water is one to two fathoms deep and turbulent, and where bottom fauna abounds (Palmer 1975). Harlequins feed on molluscs, crustaceans, insects, fish, and echinoderms (Bellrose 1976).

### **Effects of Polk Inlet Project on Population or Habitat**

Nesting habitat for the harlequin duck occurs along inland rivers and streams. Riparian habitats along all rivers and streams on the Forest will be managed according to the Stream and Lake Protection management prescription or a more restrictive management prescription (such as when a stream or river is in a Wilderness Area). The Stream and Lake Protection Management Prescription is on pages 3-180 to 3-205 of the Proposed Revised Forest Plan in the TLMP Draft Revision (1991b) and has been adopted by the Polk Inlet Project. Nesting habitat requirements are expected to be maintained. Since winter habitat occurs in the marine environment in areas of high surf and rocky beaches, no effect on harlequin ducks is anticipated with any alternatives of the Polk Inlet Project.

## **OLIVE-SIDED FLYCATCHER (*Contopus borealis*)**

## **Distribution and Population**

The olive-sided flycatcher breeds in wooded regions from central Alaska east to Newfoundland and south to northern Baja California and central Arizona in the West, central Minnesota and northern Michigan in the Central States, and North Carolina and Tennessee in the East. The species winters in South America.

It inhabits open coniferous forests and forest edges along lakes, streams, and muskegs (Bent 1942). Godfrey (1979) described the habitat of the species as "burntlands with standing dead trees, bogs, lakeshores with water-killed trees, lumbered areas, and other clearings in woodland; sometimes tall trees about farmland, occasionally orchards." DellaSala et al. (1994) noted that the species was often observed using habitats associated with lakes and muskegs during a breeding bird study on central Prince of Wales Island.

## **Effects of Polk Inlet Proposed Action on Population or Habitat**

Riparian habitats along all lakes, rivers, and streams on the Forest will be managed according to the Stream and Lake Protection management prescription or a more restrictive prescription (such as when a stream or river is in a Wilderness Area). The Stream and Lake Protection management prescription is on pages 3-180 to 3-205 of the Proposed Revised Forest Plan in the TLMP Draft Revision (1991b) and has been adopted by the Polk Inlet Project.

Upland habitat value for the olive-sided flycatcher may improve due to logging, particularly with the type of harvest proposed for the Polk Inlet Project. Created openings will produce greater edge, and the partial cutting and clearcut types prescribed for the Polk Inlet Project all incorporate varying degrees of reserve trees and snags, which should improve flycatcher habitat. Therefore, the Project may affect olive-sided flycatcher habitat, though the effect is likely to be positive.

## **SPOTTED FROG (*Rana pretiosa*)**

### **Distribution and Population**

The spotted frog occurs in or near freshwater including marshy ponds, streams, and lakes as high as 9,842 feet (3,000 meters) in parts of its range (Stebbins 1985). This species is believed to range south from the Taku river to other transboundary rivers and some islands of Southeast Alaska and British Columbia (Holmberg, April 17, 1992). Spotted frogs have been documented in the Stikine River basin (Waters 1992). Presence of spotted frogs on Prince of Wales Island has not been confirmed. A search for spotted frogs was made by interdisciplinary-trained teams that conducted field reconnaissance of all potential Polk Inlet harvest units. These teams included wildlife and fish biologists, botanists, foresters, and other disciplines. One unconfirmed sighting was reported; upon further investigation this sighting was changed to a wood frog observation. A similar unconfirmed sighting in the south Prince of Wales area was also changed to a wood frog sighting after further investigation.

### **Effects of Polk Inlet Proposed Action on Population or Habitat**



Riparian habitats along all lakes, rivers and streams on the Forest will be managed according to the Stream and Lake Protection management prescription or a more restrictive management prescription (such as when a stream or river is in a Wilderness Area). The Stream and Lake Protection management prescription is on pages 3-180 to 3-205 of the Proposed Revised Forest Plan in the TLMP Draft Revision (1991b) and has been adopted by the Polk Inlet Project. With the implementation of Stream and Lake Management Prescriptions, no effect on the spotted frog habitat is anticipated by the Polk Inlet Project, whether or not the species occurs within the Project Area.

## CANDIDATE (Category 2) PLANT SPECIES

### *Aster yukonensis*

This taxon is known from an area near Bettles, north of the Yukon River, and from the north (continental) side of the St. Elias Range, north of Yakutat (Murray and Lipkin 1987). As the Project Area is located outside the known range of this species, *Aster yukonensis* would not be expected to occur in the Project Area (DeMeo 1992).

Searches for candidate and sensitive plants were made by interdisciplinary-trained teams that conducted field reconnaissance's of all potential Polk Inlet harvest units. These teams included botanists, wildlife and fish biologists, and other disciplines. No observations of this species were made. Since *Aster yukonensis* is not known to occur in the Project Area, there are no anticipated effects of the Polk Inlet proposed action on its population or habitat.

### *Calamagrostis crassiglumis*

Disjunct populations of this grass are known along the Pacific coast from Kodiak Island south to northern California. The plant grows in marshy wet areas, muddy areas near lakes, beach meadows, and rocky soil. This plant does not grow in muskeg habitats (Muller 1991). Based on collections in Alaska and British Columbia, the plant may be found in the Project Area.

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units. Furthermore, this species is not known to occur in forested areas; therefore, no direct effects from timber harvest are anticipated, even if the species does exist in the Project Area. Changes in drainage due to roading or other activities may affect habitat and populations of the plant (DeMeo 1992). Stream, estuary, and lakeshore buffers should provide adequate protection for this plant.

### *Carex lenticularis* var. *dolia*

This sedge is known to occur in the coastal mountains of southern Alaska and may be expected to occur in the Project Area (DeMeo 1992).

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units. This species is not known to occur in forested areas; therefore, there are no effects anticipated from timber harvest.



***Montia bostockii***

This small herb occurs in alpine and subalpine meadows in the Brooks Range through the Wrangell-St. Elias Range (Muller 1991). It would not be expected to occur in the Project Area (DeMeo 1992).

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units. Since *Montia bostockii* is not known to occur in the Project Area, there are no effects anticipated from Polk Inlet timber harvest activities.

#### IV. SENSITIVE SPECIES EVALUATION

##### PEALE'S PEREGRINE FALCON (*Falco peregrinus pealei*)

Refer to previous discussion under the American peregrine falcon (*F. p. anatum*).

##### OSPREY (*Pandion haliaetus*)

Ospreys occur in low numbers in Southeast Alaska during the spring/summer nesting period from late April through August. They are believed to overwinter in Mexico and Central America. All documented osprey nest sites occur outside the Polk Inlet Project Area. There are eight documented osprey nest sites and four known nesting pairs at Thomas Bay, Wrangell Narrows near Finger Point, and near the mouth of McCormick Creek on Wrangell Island (Hughes, undated, as cited in Forest Service 1991b). Sightings of osprey have also been recorded at Towers Arm, Irish Lakes, and Kah Sheets on Kupreanof Island. Nest trees in these areas consist of broken-top spruce (live or dead) and snags of western hemlock in hemlock/spruce forest types near streams or coastal beaches. Historically, the Southeast Alaska population of osprey appears to have remained stable but low. It is unknown why osprey occur in relatively low numbers in this region, but available nest sites and foraging areas do not appear to be limiting factors.

##### Effects of Polk Inlet Proposed Action on Population or Habitat

The Polk Inlet Project is not expected to affect nesting osprey as no known nest sites occur in the Project Area and availability of nesting and foraging areas does not appear to be a factor limiting population growth. In addition, minimal or no effects on preferred osprey habitat are expected from project activities as uncut buffers will be maintained near streams, lakes, and coastal areas. If nests are discovered in the Project Area, standards and guidelines outlined in the Forest Plan will be followed.

##### TRUMPETER SWAN (*Cygnus buccinator*)

Trumpeter swans overwinter in or migrate through ice-free areas of Southeast Alaska. They have been observed in the Project Area from October through March on the Old Frank Lakes system, a small lake southeast of Kina Cove, near Cable Creek, and at several small ponds east of Polk Inlet (West 1991). They are common in other nearby areas including Thorne Lake, Lake Ellen, and Klawock Lake during the winter (West 1991; memo from M. Brown, Forest Service, Juneau, November 10, 1993). They migrate to more northern areas of Alaska during the spring/summer. The only documented nesting trumpeter swans occur north of the project area at Yakutat (19 pairs). An additional 13 nesting pairs occur in the Chilkat Valley on non-National Forest System lands (Forest Service 1991b). Nests in Southeast Alaska occur in wetland and/or riparian habitat along streams, rivers, lakes and ponds.

## Effects of Polk Inlet Proposed Action on Population or Habitat

No direct disturbance to trumpeter swans is expected from the Polk Inlet Project because associated activity will occur during non-winter periods when the swans are absent from the Project Area. As trumpeter swans appear to prefer shoreline areas of ice-free waters, the Polk Inlet Project is not expected to impact the habitat of this species since project activities will occur primarily in forested habitats. A specific mitigation measure (W11 in the Polk Inlet DEIS) was designed to protect wintering swans from disturbance due to road construction or harvest activities that might be conducted near swan wintering habitat and during the time period that swans might be present. In addition, estuarine and coastal areas will be preserved through maintenance of uncut buffers. Other standards and guidelines, including those associated with stream and lake protection or fish habitat and water quality, would also apply in maintaining trumpeter swan habitats. However, factors limiting the distribution and population of nesting pairs are currently unknown.

### *Cirsium edule*

This regionally endemic thistle species is distributed primarily along coastal Oregon, Washington, and British Columbia and barely reaches southernmost Southeast Alaska. The only documented occurrence is near Hyder in interior Southeast Alaska near the border of Canada (Forest Service 1994). It is unknown whether this species occurs in the Project Area. Its habitat in Alaska is characterized as wet meadows and open woods along glacial streams.

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. This species would not be expected to occur in the Project Area due to its limited coastal distribution. In addition, timber harvest generally avoids wet meadows and stream margins. Thus, no direct effects from timber harvest are anticipated even if the species were to occur in the Project Area.

### *Glyceria leptostachya*

This grass species is distributed from Southeast Alaska to central California. Its distribution in Alaska is limited to central and southern Southeast Alaska. However, it is known to occur in Alaska only from two documented occurrences near Wrangell (Forest Service 1994). It is unknown whether this species occurs in the Project Area. Little is known about its abundance but based on infrequency of sightings, it is unlikely to occur in large numbers in Southeast Alaska (Forest Service 1994). It is found in wet lowland habitats including swamps and stream and lake margins.

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. However, if the species does exist in the Project Area, no direct effects from timber harvest are anticipated because stream and lakeshore buffers should provide adequate protection for this plant. In addition, timber harvest activities would not occur in swamps where the species might occur.



### *Hymenophyllum wrightii*

This fern species occurs in coastal areas of Southeast Alaska and British Columbia. Three sightings have been documented in Alaska and are limited to Biorka and Mitkof Islands on the Tongass National Forest (Forest Service 1994). It is unknown whether this species occurs in the Project Area. This species appears to prefer humid shaded boulders, cliffs, tree trunks and damp woods in the wettest maritime regions. In Alaska, it has been found in small populations on the base of trees and rock outcrops in damp humid woods.

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. Since *Hymenophyllum wrightii* is not known to occur in the Project Area, no effects are anticipated from Polk Inlet timber harvest activities. However, potentially undetected specimens could be affected by removal of trees from damp woods of the Project Area which may be harvested.

### *Isoetes truncata*

This rooted aquatic species is known only from a few widely isolated populations on Vancouver Island and southcentral Alaska on the Copper River Delta (Forest Service 1994). It is unknown whether this species occurs in the Project Area. *Isoetes truncata* occurs in shallow water of lakes and streams.

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. Furthermore, due to its rooted aquatic nature, this species does not occur in forested areas; therefore, no direct effects from Polk Inlet timber harvest are anticipated even if the species does exist in the Project Area. In addition, stream and lakeshore buffers should provide adequate protection for this plant.

### *Lingusticum calderi*

This plant species occurs in British Columbia and southcentral and Southeast Alaska. Documented occurrences in Alaska are limited to two disparate areas at Kodiak Island and Dall Island (just west of Prince of Wales Island) in Pleistocene refugia on limestone substrate (Forest Service 1994). It is unknown whether this species occurs in the Project Area. *Lingusticum calderi* occurs on rocky cliffs, open boggy or rocky slopes, and edges of coniferous forests. In Alaska it is known from alpine meadow habitats and edges of subalpine mixed coniferous forest.

No observations of this species were made during field reconnaissance of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. Since *Lingusticum calderi* is not known to occur in the Project Area, no effects are anticipated from Polk Inlet timber harvest activities. However, potentially undetected specimens could be affected by removal of timber along subalpine mixed coniferous forest edges.

### *Platanthera chorisiana*

In Alaska, this bog orchid species is limited to the Aleutian Islands and southern coastal areas (Forest Service 1994). Eight occurrences have been documented in Alaska, primarily from the Aleutians. Elsewhere in Alaska, reported sightings are disjunct and infrequent and are limited to areas near Juneau (primarily Chichagof Island) and Prince William Sound. It is unknown whether this species occurs in the Project Area. *Platanthera chorisiana* occurs in specialized moist open habitat with acid substrates consisting of heaths, swamps, and sphagnum bogs from near sea level to 500 feet.

No observations of this species were made during field reconnaissance's of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. Since *Platanthera chorisiana* is not known to occur in the Project Area, no effects are anticipated from Polk Inlet timber harvest activities. Furthermore, this species does not appear to occur in forested areas; thus, no direct effects from timber harvest are anticipated even if the species does exist in the Project Area.

### *Platanthera gracilis*

This species of bog orchid is limited to a small geographic range in southernmost Southeast Alaska and adjacent British Columbia (Forest Service 1994). Four documented sightings have been made in Alaska near Pearse Canal and on Dall Island. It is unknown whether this species occurs in the Project Area. This plant occurs in wet open meadow habitat. It is undetermined whether the taxon of this species is distinct; if it is not, it may be more common than previously believed (Forest Service 1994).

No observations of this species were made during field reconnaissance's of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. This species does not appear to occur in forested areas; thus, no direct effects from timber harvest are anticipated even if the species does exist in the Project Area.

### *Poa laxiflora*

The distribution of this grass species is scattered between Southeast Alaska and Oregon. Seven sightings have been documented in Southeast Alaska near Hoonah, Sandborn Canal at Port Houghton, and Admiralty Island (Forest Service 1994). It is unknown whether this species occurs in the Project Area. *Poa laxiflora* is associated with moist, open lowland woods and open-forested meadows.

No observations of this species were made during field reconnaissance's of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. However, potentially undetected specimens could be affected by removal of timber from Polk Inlet harvest units encompassing open lowland woods and open-forested meadows.

*Ranunculus orthorhynchus* var. *alaschensis*

This species of buttercup is distributed from coastal southern Southeast Alaska to adjacent British Columbia and Vancouver Island (Forest Service 1994). The closest documented occurrences to the Project Area include near Craig on Prince of Wales Island, Howkan, and Revillagigedo and Tatoosh Islands. It occurs in moist, open lowland meadows and other moist open habitats.

No observations of this species were made during field reconnaissance's of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. However, as *Ranunculus orthorhynchus* var. *alaschensis* is known to occur just west of the Project Area near Craig, it may also occur in the Project Area. Even if this species does occur in the Project Area, direct effects from removal of timber from Polk Inlet harvest units are not anticipated to be significant as preferred open, moist habitats are generally avoided for timber harvest.

*Senecio moresbiensis*

This species of butterweed is limited to the Queen Charlotte Islands of British Columbia and to disjunct populations in southeastern Alaska and northwestern Vancouver Island (Forest Service 1994). Five occurrences have been documented in Alaska at Prince of Wales, Coronation, and Dall Islands. The only Prince of Wales sighting was made at Kasaan Mountain just east of the Project Area. *Senecio moresbiensis* occurs in shady wet areas and bogs of montane to alpine habitats, on open, rocky or boggy slopes, and in open, rocky heath or grass communities (Douglas 1982 in USFS 1994).

No observations of this species were made during field reconnaissance's of all potential Polk Inlet harvest units and no sightings have been documented in the Project Area. However, as *Senecio moresbiensis* is known to occur just east of the Project at Kasaan Mountain, it may also occur in the Project Area. Even if this species does occur in the Project Area, direct effects due to removal of timber from Polk Inlet harvest units are not anticipated to be significant as preferred habitats generally would not be harvested.



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## VI. DOCUMENTATION OF CORRESPONDENCE WITH OTHER AGENCIES

June 5, 1987: U.S. Fish and Wildlife Service memorandum, recommended changing the Prince of Wales flying squirrel from a Category 2 candidate species to a Category 3c candidate species.

Aug. 4, 1989: USDA Forest Service memo summarizing the interagency workshop to recommend patch size relationships and corridor requirements for the MIS and TES species, held July 31 - Aug. 1.

Dec. 4, 1990: NMFS publishes final rule in the Federal Register listing the Steller sea lion as a threatened species.

March 20, 1991: Interagency Wildlife Technical Committee Meeting.

April 2-4, 1991: Marbled murrelet workshop sponsored by the USFWS.

Sept. 5, 1991: USFWS letter critique of USDA Forest Service Region 3 Management Guidelines for the Northern Goshawk in the Southwestern Region, (56 FR 122, 28853).

Dec. 17, 1991: Status report on R10 sensitive species candidates.

Jan. 28, 1992: Forest Service letter to NMFS requesting list of T & E species in proposed project areas.

Feb. 6, 1992: NMFS letter listing humpback whale and Steller sea lion as being within the central Prince of Wales project area.

March 5, 1992: Letter from USFWS concerning T & E in Lab Bay, Prince of Wales, Polk Inlet and Revilla timber sale areas.

April 8, 1992: Phone conversation with NMFS about the status of recovery plans for whales and the Steller sea lion, and proposed regulations for approaching marine mammals.

April 8, 1992: Letter to USFWS requesting updated list of T & E and proposed and candidate species.

April 9, 1992: Phone conversation with the Alaska Natural Heritage Program to check on any changes in the listing of candidate plants.

April 15, 1992: Letter from USFWS updating the list of threatened, endangered, and candidate species likely to occur on the Forest.

April 17, 1992: Phone conversation with the USFWS clarifying that the Aleutian Canada goose is not likely to occur on the Forest.



April 17, 1992: Letter from USFWS stating that the spotted frog is a candidate species that should be given consideration in the Lab Bay, Prince of Wales, Polk and Revilla timber sale areas.

June 24, 1992: USDA Forest Service memo describing current status of goshawk call survey.

Aug. 13, 1992: USFWS letter critique of USDA Forest Service Region 3 Management Guideline Revision for the Northern Goshawk in the Southwestern Region, (57 FR 119, 27424).

Aug. 18, 1992: Interim habitat recommendations for the northern goshawk, USDA Forest Service, Alaska Region, Juneau.

Sep. 30, 1993: Letter to ADF&G containing a summary of results for Control Lake Project marbled murrelet surveys.

Sep. 8, 1994: Meeting with ADF&G and other state agencies on Polk Inlet Project old-growth retention strategy and FEIS alternatives.

Sep. 8, 1994: Meeting with USFWS on Polk Inlet Project old-growth retention strategy and FEIS alternatives.

Sep. 14, 1994: Letter from USFWS concerning Sep. 8, 1994 meeting, reiterating concerns regarding the Queen Charlotte goshawk and Alexander Archipelago wolf, and identifying the Harlequin duck and olive-sided flycatcher as species of concern.



